

**CITY OF SAN BERNARDINO
DRAFT
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION (IS/MND)**

**Verdemont Heights Residential Development
Verdemont Drive, San Bernardino**

(Tentative Parcel Map No. 20707)

Project Description and Location: GFR Homes (Project Applicant) is requesting approval of a Tentative Parcel Map (TTM No. 20707) to subdivide a 107.7-acre parcel, described as Assessor's Parcel Number (APN) 0348-121-14, -27, and -28; and 0261-011-02, -03, and -10 into 105 single-family residential lots and five lettered lots (see Figure 1 – Site Plan). The property is within a single-family residential area of the San Bernardino foothills in the City of San Bernardino north of Verdemont Drive, east of Antique Street, and west of Escena Street (see Figure 2 – Regional Vicinity and Figure 3 – Vicinity Map). The Project Site is currently vacant land that supports creosote bush scrub. The Project Site is zoned Residential Low (LR) within the Land Use Category of Single Family Residential (SFR). The Proposed Project is an allowable use within the zoning of Residential Low (LR) and is therefore consistent with the City of San Bernardino General Plan Land Use and Zoning Districts. The proposed residential lots would range from approximately 9,980 to 24,683 square feet (refer to Figure 1-Site Plan). Access to the site would be from Little League Drive and Verdemont Drive onto internal "A" street. Internal streets "C", and "D", are accessible from "A" Street and Antique Street. Internal streets "F" and "G" are accessible from Verdemont Drive.

February 2026

LEAD AGENCY:

City of San Bernardino
Community Development and Housing Department, Planning Division
Chantel Choice, (909) 384-5930
201 North "E" Street
San Bernardino, CA 92401

PREPARED BY:

Lilburn Corporation
1905 Business Center Drive
San Bernardino, CA 92408
909-890-1818

PREPARED FOR:

Verdemont Heights I LLC.
434 North 2nd Avenue
Upland, CA 91786

The California Environmental Quality Act (CEQA) requires the preparation of an Initial Study when a proposal must obtain discretionary approval from a governmental agency and is not exempt from CEQA. The purpose of the Initial Study is to determine whether or not a proposal, not exempt from CEQA, qualifies for a Negative Declaration or if an Environmental Impact Report (EIR) must be prepared.

1. Project Title: Verdemont Heights

2. Lead Agency: City of San Bernardino
Office: 201 North “E” Street, 3rd Floor, San Bernardino, California 92401
Mailing: 290 North “D” Street, San Bernardino, California 92401

3. Lead Agency Contact Person: Chantel Choice, Senior Planner
(909) 384-7272, Choice_Ch@sbcity.org

4. Project Location (Address/Nearest cross-streets):

The property is located north of Verdemont Drive, east of Antique Street, and west of Escena Street in Verdemont Heights in the City of San Bernardino (Assessor’s Parcel Numbers: 0348-121-14, -27, -28; and 0261-011-02, -03, -10).

Regional Location: Regionally, the Project Site is located within an urbanized area in the northwestern portion of San Bernardino that is primarily residential. The Project Site is located south of the San Bernardino National Forest. Regional access to the Project Site is from Interstate 215 Palm Avenue on/off ramps are approximately 0.9 miles to the south.

Project Site Location: The Project Site is located within the City of San Bernardino in the Verdemont Heights area. The property is located north of Verdemont Drive, east of Antique Street, and west of Escena Street. Approximately 0.9 miles west of the Project Site is the I-215. Surrounding land uses include vacant land to the north and to the west, and residential housing to the south and to the east.

5. Project Applicant(s)/Sponsor(s) name and address:

JEC Enterprises Inc.
Felizardo Robles Jr, President
434 N 2nd Ave, Upland, CA 91786

Arlene Anaya
434 N. 2nd Ave, Upland, CA 91786
(909) 949 1400 x 106

6 and 7. Existing General Plan/Zoning Designations: Surrounding land uses include: vacant land to the north, west, and east, and single-family residences to the south. The site is within the Hillside Management Overlay/Foothill Fire Zone Overlay (FF). Table 1 provides the General Plan and zoning designations for the surrounding properties:

Table 1
Existing General Plan and Zoning Designations

Location	Existing Use	General Plan Designation	Zoning Designation
Site	Vacant land	Single Family Residential (SFR)	Residential Low (RL)
North	Vacant land	Open Space	Resource Conservation (RC)
South	Single Family Residential (SFR)	Single Family Residential (SFR)	Residential Low (RL)
East	Single Family Residential (SFR)	Single Family Residential (SFR)	Residential Low (RL)
West	Vacant Land	Single Family Residential (SFR)	Residential Low (RL)

Description of Project (Describe the whole action involved, including, but not limited to later phases of the project and any secondary, support, or off-site feature necessary for its implementation. Attach additional sheets if necessary): GFR Homes (Project Applicant) is requesting approval of a Tentative Parcel Map (TTM No. 20707) to subdivide a 107.7-acre parcel, described as Assessor's Parcel Number (APN) 0348-121-14, -27, and -28; and 0261-011-02, -03, and -10 into 105 single-family residential lots and five lettered lots (see Figure 1 – Site Plan). The property is within a primarily scattered residential area of the San Bernardino foothills in the City of San Bernardino north of Verdernont Drive, east of Antique Street, and west of Escena Street (see Figure 2 – Regional Vicinity and Figure 3 – Vicinity Map). The Project Site currently supports creosote bush scrub that are found on-site. The Project Site is currently vacant and zoned Residential Low (RL) within the Land Use Category of Single Family Residential (SFR). The Proposed Project is an allowable use within the zoning of Residential Low (RL) and is therefore consistent with the City of San Bernardino General Plan Land Use and Zoning Districts. The lots would range from approximately 9,980 to 24,683 square feet (refer to Figure 1-Site Plan). Access to the site would be from Little League Drive and Antique Street onto internal streets "A, B, C, and D" are accessible from "A" street and Verdernont Drive. Internal streets "F" and "G" are accessible from Verdernont Drive. Refer to Figure 1 Site Plan and Figure 2 for the Regional Vicinity and Figure 3 Vicinity Map respectively.

9. Surrounding land uses and setting: The land uses in the vicinity of the Project Site are a mix of commercial, industrial, flood plain, transportation, and residential. Sensitive receptors are described as residential land uses, schools, day care centers, and other places where people reside. The nearest sensitive receptors to the Proposed Project (measured at the property lines) include the existing single-family residential properties located adjacent to the south of the Project Site.

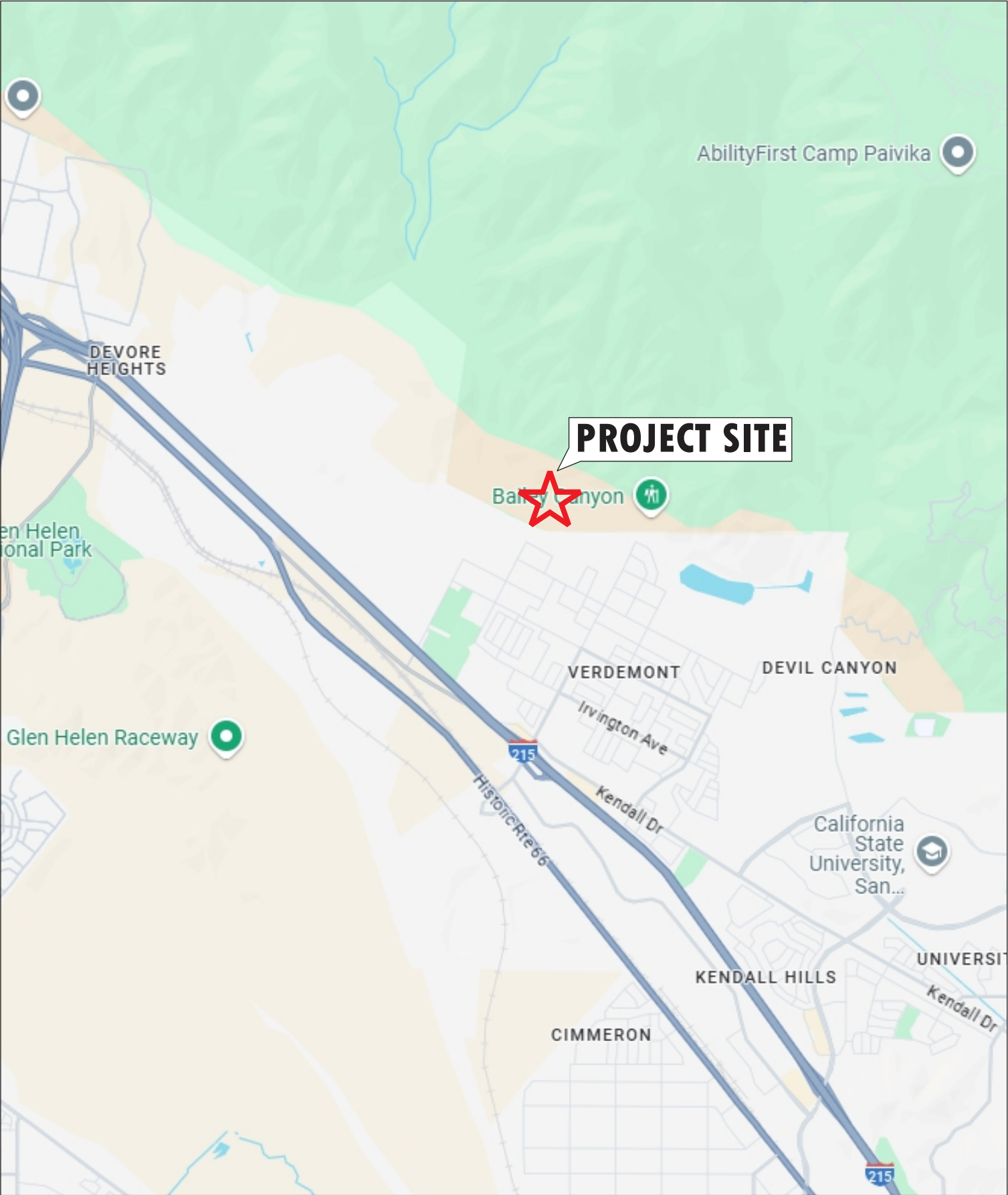
10. Other agencies whose approval is required (e.g., permits, finance approval, or participation agreement):

- City of San Bernardino Approval of Grading and Building Permits
- Santa Ana Regional Water Quality Control Board, NPDES authorization

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

Following determination of a complete Project Application, the City of San Bernardino contacted representatives of the following tribes: Gabrieleño Band of Mission Indians - Kizh Nation, San Manuel Band of Mission Indians, and Soboba Band of Luiseño Indians pursuant to AB52. The City of San Bernardino received responses from two of the Native American tribes as summarized below.

The Yuhaaviatam of San Manuel Nation provided an email to the City indicating that the Project Site was within their Ancestral Tribal Territory. Tribal consultation took place via email. At the end of consultation, and subsequently in a letter dated, the Tribe provided specific mitigation measures to be adopted by the City (TCR-1 through TCR-2). The City also received a response via email from the Gabrieleno Band of Mission Indians-Kizh Nation on May 7, 2025, providing mitigation measures TCR-3 through TCR-5). These Mitigation Measures are listed in the Tribal Cultural Resources Section of this Initial Study.



REGIONAL VICINITY

VERDEMONT HEIGHTS TTM 20707
City of San Bernardino, California

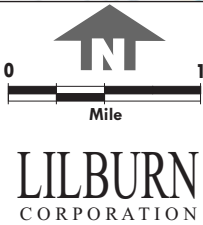
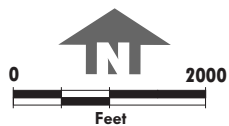


FIGURE 2



LILBURN
CORPORATION

VICINITY MAP
VERDEMONT HEIGHTS TTM 20707
City of San Bernardino, California

FIGURE 3

INITIAL STUDY/ENVIRONMENTAL CHECKLIST

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist on the following pages.

- | | | |
|--|---|---|
| ☐ Aesthetics | ☐ Agriculture & Forestry Resources | ☐ Air Quality |
| ☒ Biological Resources | ☒ Cultural Resources | ☐ Energy |
| ☐ Geology/Soils | ☐ Greenhouse Gas Emissions | ☐ Hazards & Hazardous Materials |
| ☐ Hydrology/Water Quality | ☐ Land Use / Planning | ☐ Mineral Resources |
| ☒ Noise | ☐ Populations / Housing | ☐ Public Services |
| ☐ Recreation | ☐ Transportation | ☒ Tribal Cultural Resources |
| ☐ Utilities / Service Systems | ☐ Wildfire | ☐ Mandatory Findings of Significance |

On the basis of this Initial Study, the City of San Bernardino Environmental Review Committee finds:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Chantal Choice

Signature

March 13, 2026

Date

Chantal Choice, Planning Division

Evaluation of Environmental Impacts:

- 1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 4) “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify:
 - a) the significance criteria or threshold, if any, used to evaluate each question; and
 - b) the mitigation measure identified, if any, to reduce the impact to less than significance

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
I. AESTHETICS – Would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Discussion:

- a) **Less than Significant Impact.** The City of San Bernardino General Plan (General Plan) identifies the importance of conservation of local scenic resources such as natural and cultural resources and how they are necessary assets for the community. The Project Site is located north of Verdemont Drive within the City of San Bernardino, California. The vista from the Project Site includes vacant lands to the north and west, and existing residential homes to the east and the south. The proposed development of the 105 single-family residences would be comparable in height to the nearby one-story and two-story residences located to the south of the Proposed Project. The land use of the Proposed Project is Single Family Residential and is consistent with the General Plan. Additionally, the General Plan does not identify the Project Site and/or any scenic vistas in the vicinity of the Project Site. The development of future homes would be required to conform with the applicable development standards of the City of San Bernardino Municipal Code. The development of the Proposed Project will have a less than significant impact on scenic vistas. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.
- b) **Less than Significant Impact.** As shown on Figure C-1: “Scenic Highways/Routes” of the City of San Bernardino General Plan, the Project Site is not adjacent to or in the vicinity of a designated State scenic highway nor is it near any State scenic highway corridor.¹ The nearest State scenic highway to the Project Site is State Route 330 located approximately 9.8 miles east of the Project Site. State Route 330 is designated as a State Scenic Highway.² The General Plan does not identify

¹ City of San Bernardino General Plan, Figure C-1: “Scenic Highways/Routes”. Page 6-9.

² San Bernardino Countywide Plan. NR-3: Scenic Routes and Highways. Accessed May 6, 2024.

any scenic resources on or adjacent to the Project Site. No rock outcroppings currently exist on-site. The Project Site currently supports creosote bush scrub that are found on-site that would be removed during site preparation; construction of the homes would include landscaping with trees, shrubs, and lawn. The Proposed Project shall adhere to the Chapter 19.28.100 “Removal or Destruction of Trees” of the San Bernardino City Municipal Code as applicable to ensure that less than significant impacts occur. With approval of the Proposed Project’s Landscape Plan, adherence to the Municipal Code, less than significant adverse impacts are identified or anticipated, and no mitigation measures are required.

- c) **Less than Significant Impact.** The Proposed Project would involve the development of 105 single residential lots consistent with the City’s General Plan. The City Development Code provides development standards for the City’s urban area, such as height restrictions and other design guidelines which are intended to reduce any potential degradation to visual character and quality of public views. The Proposed Project would not substantially degrade the existing visual character or degrade any existing public views that are publicly accessible from a vantage point as it is bordered on the south and east by single-family residential. Adjacent uses to the Project Site include vacant land to the north and to the west. Existing single-family residences are located to the south and east of the Project Site. The design of the project would be in accordance with the City’s Development Code and would provide appropriate landscaping. Implementation of the Proposed Project would be comparable to adjacent uses and would not conflict with applicable zoning and other regulations governing scenic quality. Therefore, less than significant adverse impacts are identified or anticipated, and no mitigation measures are required.
- d) **Less than Significant Impact.** The development of the 105 single-family residential homes would not generate a significant amount of light and glare when compared to the surrounding areas which includes existing lighting from urban development including streetlighting and residential lighting. The design and placement of the light fixtures within the future new development would be reviewed for consistency with the Section 19.20.030 of the Development Code and subject to City approval. Standards require shielding, diffusing, and indirect lighting to avoid glare. Lighting would be selected and located to confine the area of illumination to on-site streets. In accordance with the City Development Code, a Lighting Plan would be submitted for City review and lighting would be selected and located to confine the area of illumination to on-site streets with no spill-over to adjacent residential development.

Additionally, during Project construction, nighttime lighting may be used within the construction staging areas to provide security for construction equipment. Due to the distance between the construction area and motorists on adjacent roadways, such security lights may result in glare to motorists. However, this potential impact would be reduced to a less than significant level because prior to issuance of grading permits, the Applicant shall provide evidence to the City that any temporary nighttime lighting installed for security purposes shall be downward facing and hooded or shielded to prevent security light spillage outside of the staging area or direct broadcast of security lighting into the sky.

Therefore, less than significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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II. AGRICULTURAL/FORESTRY RESOURCES -

Would the project:

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to a non-agricultural use? | ☐ | ☐ | ☒ | ☐ |
| b) Conflict with existing zoning for agricultural use, or a Williamson Act contract? | ☐ | ☐ | ☒ | ☐ |
| c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g), timberland as defined in Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Gov't Code Section 51104(g))? | ☐ | ☐ | ☒ | ☐ |
| d) Result in the loss of forest land or conversion of forest land to non-forest use? | ☐ | ☐ | ☒ | ☐ |
| e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of farmland, to non-agricultural use or conversion of forest land to non-forest use? | ☐ | ☐ | ☒ | ☐ |

Discussion:

- a) **Less than Significant Impact.** The Project Site is mapped within the California Department of Conservation Farmland Mapping and Monitoring Program Map and Statistical Data Tool “California Important Farmland Finder”³ as an area identified as “Urban and Built-Up Land”. According to the California Department of Conservation, Built-Up Land is defined as land occupied by structures with a building density of at least 1 unit to 1.5 acres, or approximately 6 structures to a 10-acre parcel. Lands in this category are used for residential, industrial, commercial, construction, institutional, public administration, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes. No prime farmland, unique farmland, or farmland of statewide importance occurs at the Project Site or within the immediate vicinity. Therefore, less than significant impacts are identified or anticipated, and no mitigation measures are required.
- b) **Less than Significant Impact.** The Project Site is not under a Williamson Act Contract as identified by Figure NR-5 Agricultural Resources map of San Bernardino Countywide Plan

³ California Important Farmland Finder. <https://maps.conservation.ca.gov/dlrp/ciff/>. Accessed July 8, 2024.

(accessed 07/08/2024).⁴ Additionally, the City of San Bernardino's General Plan does not designate any of the land within the Project Site or in its immediate vicinity for agricultural use. Therefore, less than significant impacts are identified or anticipated, and no mitigation measures are required.

- c) **Less than Significant Impact.** The Project Site is located in the San Bernardino Valley region and is zoned Residential Low (RL). It does not support, nor is it near any forest land. Therefore, implementation of the Proposed Project would not convert forest land to non-forest use or cause rezoning of forest land or timberland. Less than significant impacts are identified or anticipated, and no mitigation measures are required.
- d, e) **Less than Significant Impact.** The Project Site does not support forest land nor does the Project Site support farmland. Implementation of the Proposed Project would not convert forest land to non-forest use or farmland to non-agricultural use. Therefore, less than significant impacts are identified or anticipated, and no mitigation measures are required.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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III. AIR QUALITY – Would the project:

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Conflict with or obstruct implementation of the applicable air quality plan? | ☐ | ☐ | ☒ | ☐ |
| b) Result in a cumulatively considerable increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)? | ☐ | ☐ | ☒ | ☐ |
| c) Expose sensitive receptors to substantial pollutant concentrations? | ☐ | ☐ | ☒ | ☐ |
| d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? | ☐ | ☐ | ☒ | ☐ |

⁴ San Bernardino Countywide Plan: NR-5 Agricultural Resources
<https://www.arcgis.com/apps/webappviewer/index.html?id=fcb9bc427d2a4c5a981f97547a0e3688>. Accessed July 8, 2024.

Discussion:

- a) **Less than Significant Impact.** The Project Site is located within the South Coast Air Basin, which includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. Air quality within the South Coast Air Basin is under the jurisdiction of the South Coast Air Quality Management District (AQMD) and the California Air Resources Board (CARB). The Air Quality Management Plan (AQMP) for the basin establishes a program of rules and regulations administered by the South Coast AQMD to obtain attainment of the state and federal air quality standards. The most recent AQMP (2022 AQMP) was adopted by the South Coast AQMD on December 2, 2022. The 2022 AQMP incorporates the latest scientific and technological information and planning assumptions, including transportation control measures developed by the Southern California Association of Governments (SCAG) from Connect SoCal - the 2020 Regional Transportation Plan/Sustainable Communities Strategy, and updated emission inventory methodologies for various source categories.

Consistency with the AQMP is determined by evaluating the assumptions and objectives of the AQMP and discussing whether the proposed project would interfere with the region's ability to comply with Federal and State air quality standards. If it is determined that the proposed project is inconsistent, the lead agency may consider project modifications or inclusion of mitigation to eliminate the inconsistency. The SCAQMD CEQA Handbook states that "New or amended General Plan Elements (including land use zoning and density amendments), Specific Plans, and significant projects must be analyzed for consistency with the AQMP." Strict consistency with all aspects of the plan is usually not required. A proposed project is anticipated to be consistent with the AQMP if it furthers one or more policies and does not obstruct other policies. The SCAQMD CEQA Handbook identifies two key indicators of consistency:

- (1) Increase in the Frequency or Severity of Violations: whether the project will result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.
- (2) Exceed Assumptions in the AQMP: whether the project will exceed the assumptions in the AQMP in 2022 or increments based on the year of project buildout and phase.

Based on the air quality modeling analysis, neither short-term construction, nor long-term operation of the proposed project will result in significant impacts based on the SCAQMD regional and local thresholds of significance. Therefore, the proposed project is not anticipated to contribute to the exceedance of any air pollutant concentration standards. Refer to Tables 2 through Table 4 for additional information.

The City of San Bernardino currently designates the Project Site as Residential Low under which the Proposed Project is an allowable use. The proposed project does not involve a General Plan Amendment or a Change of Zone. The proposed project is consistent with the development standards of the Residential Low designation and zoning classification. The Proposed Project would increase operational emissions from mobile sources, compared to the current use as vacant land. Additionally, large population or employment increases could affect transportation control strategies, which are among the most important in the air quality plan, since transportation is a major contributor to particulates and ozone for which the SCAB is not in attainment. Approval of the project would not substantially change projected population or employment levels. Development of the project would be required to comply with the current Uniform Building Code

(UBC). The UBC incorporates necessary building requirements to ensure responsible building. As the Proposed Project does not include activities that would substantially change population or employment levels within the air basin, the Proposed Project would not conflict with or obstruct implementation of the applicable AQMP. Therefore, the proposed project will not result in an inconsistency with the SCAQMD AQMP and a less than significant impact will occur.

- b) **Less than Significant Impact.** The Proposed Project's construction and operational emissions were screened using the California Emissions Estimator Model (CalEEMod) version 2022 (Appendix A) CalEEMod was utilized to estimate the on-site and off-site emissions. The emissions incorporate SCAQMD Rule 402 and Rule 403 by default as required during construction. The criteria pollutants screened for include reactive organic gases (ROG), nitrous oxides (NO_x), carbon monoxide (CO), sulfur dioxide (SO₂), and particulates (PM₁₀ and PM_{2.5}). Two of the analyzed pollutants, ROG and NO_x, are ozone precursors. Both summer and winter season emission levels were estimated.

Construction Emissions

Construction emissions are considered short-term, temporary emissions and were modeled with the following construction default parameters: demolition, site preparation, site grading (fine and mass grading), building construction, and paving. Architectural coating phase includes a 25-day schedule. The resulting emissions generated by construction of the Proposed Project are shown in Table 3 and Table 4, which represent summer and winter emissions, respectively.

Table 2
Construction Emissions Summary
(Pounds Per Day)

Source/Phase	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Daily Summer Max	6.4	29.2	30.1	0.0	6.6	3.8
Daily Winter Max	6.4	29.2	29.8	0.0	6.6	3.8
Highest Value (lbs/day)	6.4	29.2	30.1	0.0	6.6	3.8
SCAQMD Threshold	75	100	550	150	150	55
Significant	No	No	No	No	No	No

Source: CalEEMod 2022 Summer Emissions

Phases do not overlap and represent the highest concentration.

As shown in Table 2, construction emissions during either summer or winter seasonal conditions would not exceed SCAQMD thresholds with implementation of the following project conditions:

Compliance with SCAQMD Rules 402 and 403

Although the Proposed Project does not exceed SCAQMD thresholds for construction emissions, the Project Proponent would be required to comply with all applicable SCAQMD rules and regulations as the SCAB is in non-attainment status for ozone and suspended particulates (PM₁₀ and PM_{2.5}).

The Proposed Project would be required to comply with Rules 402 nuisance, and 403 fugitive dust, which require the implementation of Best Available Control Measures (BACMs) for each fugitive dust source, and the AQMP, which identifies Best Available Control Technologies (BACTs) for area sources and point sources. The BACMs and BACTs would include, but not be limited to the following:

Standard Conditions and Requirements:

1. The Project Proponent shall ensure that any portion of the site to be graded shall be pre-watered prior to the onset of grading activities.
 - (a) The Project Proponent shall ensure that watering (3 times a day) of the site or other soil stabilization method shall be employed on an on-going basis after the initiation of any grading activity on the site. Portions of the site that are actively being graded shall be watered regularly (twice daily) to ensure that a crust is formed on the ground surface and shall be watered at the end of each workday.
 - (b) The Project Proponent shall ensure that all disturbed areas are treated to prevent erosion until the site is constructed upon.
 - (c) The Project Proponent shall ensure that landscaped areas are installed as soon as possible to reduce the potential for wind erosion.
 - (d) The Project Proponent shall ensure that all grading activities are suspended during first and second stage ozone episodes or when winds exceed 25 miles per hour.

During construction, exhaust emissions from construction vehicles and equipment and fugitive dust generated by equipment traveling over exposed surfaces, would increase NO_x and PM₁₀ levels in the area. Although the Proposed Project does not exceed SCAQMD thresholds during construction, the Applicant/Contractor would be required to implement the following conditions as required by SCAQMD:

Standard Conditions and Requirements:

2. To reduce emissions, all equipment used in grading and construction must be tuned and maintained to the manufacturer's specification to maximize efficient burning of vehicle fuel.
3. The Project Proponent shall ensure that existing power sources are utilized where feasible via temporary power poles to avoid on-site power generation during construction.
4. The Project Proponent shall ensure that construction personnel are informed of ride sharing and transit opportunities.
5. All buildings on the Project Site shall conform to energy use guidelines in Title 24 of the California Administrative Code.
6. The operator shall maintain and effectively utilize and schedule on-site equipment in order to minimize exhaust emissions from truck idling.
7. The operator shall comply with all existing and future CARB and SCAQMD regulations related to diesel-fueled trucks, which may include among others: (1) meeting more stringent emission standards; (2) retrofitting existing engines with particulate traps; (3) use of low sulfur fuel; and (4) use of alternative fuels or equipment.

Operational Emissions

Operational emissions are categorized as energy (generation and distribution of energy to the end use), area (operational use of the project), and mobile (vehicle trips). Operational emissions were estimated using the CalEEMod version 2022 and are listed in Table 3 and 4, below.

Table 3
Summer Operational Emissions Summary
(Pounds Per Day)

Source	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Mobile	4.5	5.1	50.3	0.1	11.5	3.0
Area	35.8	2.4	65.0	0.1	8.2	8.0
Energy	0.0	0.9	0.4	0.0	0.0	0.0
Totals	40.3	8.4	115.6	0.2	19.7	11
SCAQMD Threshold	55	55	550	150	150	55
Significant	No	No	No	No	No	No

Source: CalEEMod 2022 Summer Emissions

Table 4
Winter Operational Emissions Summary
(Pounds Per Day)

Source	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Mobile	4.3	5.5	41.2	0.1	11.5	3.0
Area	35.2	2.4	58.5	0.2	8.2	8.1
Energy	0.0	0.9	0.4	0.0	0.0	0.0
Totals	39.5	8.8	100.1	0.3	19.7	11.1
SCAQMD Threshold	55	55	550	150	150	55
Significant	No	No	No	No	No	No

Source: CalEEMod 2022 Winter Emissions

As shown, both summer and winter season operational emissions are below SCAQMD thresholds. The Proposed Project would not exceed any SCAQMD thresholds for criteria pollutants during construction (see Table 2). Operational emissions are less than significant and would not result in a cumulatively considerable net increase of any criteria pollutant (see Tables 3 and 4). Therefore, less than significant adverse impacts are identified or anticipated, and no mitigation measures are required.

- c) **Less than Significant Impact.** SCAQMD has developed a methodology to assess the localized impacts of emissions from a Proposed Project as outlined within the Final Localized Significance Threshold (LST) Methodology report; completed in June 2003 and revised in July 2008. The use of LSTs is voluntary, to be implemented at the discretion of local public agencies acting as a lead agency pursuant to CEQA. LSTs apply to projects that must undergo CEQA or the National Environmental Policy Act (NEPA) and are five acres or less. LST methodology is incorporated to represent worst-case scenario emissions thresholds. CalEEMod was used to estimate the on-site and off-site construction emissions. The LSTs were developed to analyze the significance of potential air quality impacts of a project to sensitive receptors (i.e. schools, single family residences, etc.) and provide screening tables for small projects (one, two, or five acres). Projects are evaluated based on geographic location and distance from the sensitive receptor (25, 50, 100, 200, or 500 meters from the site).

For the purposes of a CEQA analysis, the SCAQMD considers a sensitive receptor to be a receptor such as a residence, hospital, convalescent facility or anywhere that it is possible for an individual to remain for 24 hours. Additionally, schools, playgrounds, childcare centers, and athletic facilities can also be considered as sensitive receptors. Commercial and industrial facilities are not included

in the definition of sensitive receptor because employees do not typically remain on-site for a full 24 hours, but are usually present for shorter periods of time, such as eight hours.

The Project Site is approximately 107 acres and therefore the “five-acre” LSTs were utilized for the analysis to represent a worst-case scenario as the larger the site, the higher the screening threshold. The closest sensitive receptor are residences adjacent to the Site; therefore, LSTs are based on a 25-meter distance. The Proposed Project’s construction and operational emissions with the appropriate LST are presented in Table 5.

Table 5
Localized Significance Thresholds
(Pounds Per Day)

Source	NO _x	CO	PM ₁₀		PM _{2.5}	
Construction Emissions (Max. from Table 2)	29.2	30.1	6.6		3.8	
Operational Emissions (Max. Total from Table 3 and Table 4) ¹	8.8	115.6	2.0		1.1	
Highest Value (lbs/day)	29.2	115.6	6.6	2.0	3.8	1.1
LST Threshold	270	1,746	14*	8 [†]	4*	2 [†]
Greater Than Threshold	No	No	No	No	No	No

Sources: CalEEMod.2022 Summer and Winter Emissions; SCAQMD Final Localized Significance Threshold Methodology; SCAQMD Mass Rate Look-up Tables for a 5-acre site in SRA No. 34 Central San Bernardino Valley, distance of 25 meters.

Note: PM₁₀ and PM_{2.5} emissions are separated into construction and operational thresholds in accordance with the SCAQMD Mass Rate LST Look-up Tables.

* Construction emissions LST

[†] Operational emissions LST

Per LST Methodology, mobile source emissions do not need to be included except for land use emissions and onsite vehicle emissions. It is estimated that approximately 10 percent of mobile emissions will occur on the Project Site.

As shown in Table 5, the Proposed Project’s localized emissions are not anticipated to exceed Localized Significance Thresholds. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required

- d) **Less than Significant Impact.** Potential sources that may emit odors during construction activities include the application of materials such as asphalt pavement. The objectionable odors that may be produced during the construction process are short-term in nature, and the odor emissions are expected to cease upon the drying or hardening of the odor-producing materials. Due to the short-term nature and limited amounts of odor-producing materials being utilized, less than significant impact related to odors would occur during construction of the Proposed Project.

Furthermore, standard construction requirements would minimize odor impacts resulting from construction activity. It should be noted that any construction odor emissions generated would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction activity. In accordance with the City Development Code, the Project-generated refuse would be stored in covered containers (to be shown on final site plans for City approval) and removed at regular intervals in compliance with the City of San Bernardino’s solid waste regulations. The Proposed Project would be also required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. Therefore, less than significant adverse impacts are identified or anticipated, and no mitigation measures are required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES – Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service?	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	☐	☐	☒	☐
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☒	☐	☐
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan?	☐	☐	☐	☒

Discussion:

- a) **Less than Significant Impact with Mitigation Incorporated.** A Biological Resources Assessment dated August 23, 2024, was completed by ELMT Consulting (ELMT) and is included as Appendix B and summarized herein. As part of the biological assessment, ELMT conducted a background data search for information on plant and wildlife species known occurrences within

the vicinity of the Project Site. The data review included biological text on general and specific biological resources, and resources considered to be sensitive by various wildlife agencies, local government agencies and interest groups. A field survey of the Project Site was conducted on July 22, 2024. The field survey included an evaluation of the surrounding habitats and a focused habitat assessment for species identified in the background data search.

Vegetation

The Project Site supports three plant communities that can be classified as Riversidean sage scrub, chaparral, and sycamore woodland. In addition, the site supports one (1) land cover type that would be classified as disturbed.

Chaparral

A chaparral plant community is supported in the eastern region of the Project Site and in less disturbed areas along the northern boundary. The chaparral plant community on-site ranges in vegetative density from fairly open to somewhat dense and is dominated by large perennial woody perennial species such as California buckwheat (*Eriogonum fasciculatum*) chamise (*Adenostoma fasciculatum*), inland scrub oak (*Quercus berberidifolia*), and black sage (*Salvia mellifera*). Other common plant species observed in this plant community include deerweed (*Acmispon glaber*), California sagebrush (*Artemisia californica*), hoary leaved ceanothus (*Ceanothus crassifolius*), birch leaf mountain mahogany (*Cercocarpus betuloides*), California buckwheat (*Eriogonum fasciculatum*), chaparral yucca (*Hesperoyucca whipplei*), Southern California black walnut (*Juglans californica*), hairy horsebrush (*Tetradymia comosa*), laurel sumac (*Malosma laurina*), chaparral whitethorn (*Ceanothus leucodermis*), hollyleaf redberry (*Rhamnus illicifolia*), elderberry (*Sambucus mexicana*), and poison oak (*Toxicodendron diversilobum*).

Riversidean Sage Scrub

The northeast and southeast boundaries of the Project Site support a Riversidean sage scrub plant community. This plant community is dominated by lower-growing shrub species such as deerweed, California sagebrush, and black sage. Other common species observed in this plant community include many of the species observed in the chaparral community, notably chamise and California buckwheat. Additional species found in the Riversidean sage scrub community onsite include common sunflower (*Helianthus annuus*), yerba santa (*Eriodictyon californicum*), sugar bush (*Rhus ovata*), Peruvian pepper (*Schinus molle*), ash (*Fraxinus* sp.), Mexican palo verde (*Parkinsonia aculeata*), and telegraph weed (*Heterotheca grandiflora*).

Sycamore Woodland

The eastern portion of the Project Site, outside of the proposed limits of disturbance, support a sycamore woodland plant community that coincides with the occurrence of an ephemeral drainage feature referenced as Drainage 1. This plant community is dominated by western sycamore (*Platanus racemosa*) and supports a dense canopy layer, open shrub layer, and robust herbaceous layer. Common plant species observed in this plant community include southern California black walnut, Mexican elderberry, canyon live oak (*Quercus chrysolepis*), deerweed, California sagebrush, mule fat (*Baccharis salicifolia*), ripgut brome (*Bromus diandrus*), red brome (*Bromus rubens*), downy chess (*Bromus tectorum*), common cryptantha (*Cryptantha intermedia*), eucalyptus (*Eucalyptus* sp.), common sunflower, white horehound (*Marrubium vulgare*), and poison oak (*Toxicodendron pubescens*). This plant community is located outside of the proposed limits of

disturbance, therefore, impacts to this area are not expected to occur through proposed project implementation.

Disturbed

The Project Site primarily supports routinely disturbed land which prevents the establishment of a natural plant community. Disturbed areas onsite occur in association with a network of unpaved trails and access roads, recently graded staging and storage areas, along the southern boundary and throughout the central region of the Project Site. Disturbed land on-site ranges in vegetative density from barren to sparse and tends to support only weedy/early successional species. Common plant species observed in the non-native grassland plant community include wild oat (*Avena fatua*), foxtail brome (*Bromus madritensis*), redstemmed filaree (*Erodium cicutarium*), summer mustard (*Hirschfeldia incana*), tree tobacco (*Nicotiana glauca*), spotted spurge (*Euphorbia maculata*), tocolote (*Centaurea melitensis*), spiny sowthistle (*Sonchus asper*), Russian thistle (*S. tragus*), Mediterranean grass (*Schismus barbatus*), arundo (*Arundo donax*), common phacelia (*Phacelia distans*), castor bean (*Ricinus communis*), and sacred datura (*Datura wrightii*).

Wildlife

Plant communities provide foraging habitat, nesting/denning sites, and shelter from adverse weather or predation. This section provides a discussion of those wildlife species that were observed or are expected to occur within the Project Site. The discussion is to be used as a general reference and is limited by the season, time of day, and weather conditions in which the field survey was conducted. Wildlife detections were based on calls, songs, scat, tracks, burrows, and direct observation.

Nesting Birds and Raptors

Undisturbed areas of the Project Site support suitable nesting habitat for year-round and seasonal avian residents, as well as migrating songbirds that could occur in the area. Nesting birds are protected pursuant to the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (Sections 3503, 3503.5, 3511, and 3513 prohibit the take, possession, or destruction of birds, their nests or eggs). If construction occurs between February 1st and August 31st, a pre-construction clearance survey for nesting birds should be conducted within three (3) days of the start of any vegetation removal or ground disturbing activities to ensure that no nesting birds will be disturbed during construction.

Nesting birds are protected pursuant to the Migratory Bird Treaty Act and California Fish and Game Code (Sections 3503, 3503.5, 3511, and 3513). If construction occurs during the nesting season of migratory birds (generally February 1st and August 31st although the nesting season may be extended due to weather and/or drought conditions), a pre-construction clearance survey for nesting birds should be conducted within three days of the start of any vegetation removal or ground disturbing activities to ensure that no nesting birds would be disturbed during construction. This recommendation shall be implemented through the following mitigation measures.

Mitigation Measure BR-1: Preconstruction Survey for Nesting Birds

Nesting birds are protected pursuant to the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (Sections 3503, 3503.5, 3511, and 3513 prohibit the take, possession, or destruction of birds, their nests or eggs). In order to protect migratory bird species, a nesting

bird clearance survey should be conducted prior to any ground disturbance or vegetation removal activities that may disrupt the birds during the nesting season.

If construction occurs between February 1st and August 31st, a pre-construction clearance survey for nesting birds should be conducted within three (3) days of the start of any vegetation removal or ground disturbing activities to ensure that no nesting birds will be disturbed during construction. The biologist conducting the clearance survey should document a negative survey with a brief letter report indicating that no impacts to active avian nests will occur. If an active avian nest is discovered during the pre-construction clearance survey, construction activities should stay outside of a no-disturbance buffer. The size of the no-disturbance buffer will be determined by the wildlife biologist and will depend on the level of noise and/or surrounding anthropogenic disturbances, line of sight between the nest and the construction activity, type and duration of construction activity, ambient noise, species habituation, and topographical barriers. These factors will be evaluated on a case-by-case basis when developing buffer distances. Limits of construction to avoid an active nest will be established in the field with flagging, fencing, or other appropriate barriers; and construction personnel will be instructed on the sensitivity of nest areas. A biological monitor should be present to delineate the boundaries of the buffer area and to monitor the active nest to ensure that nesting behavior is not adversely affected by the construction activity. Once the young have fledged and left the nest, or the nest otherwise becomes inactive under natural conditions, construction activities within the buffer area can occur.

Mitigation Measure BR-2: Pre-Construction Burrowing Owl Clearance Survey

To avoid direct impacts to burrowing owls, a Designated Biologist shall conduct a pre-construction presence/absence survey for burrowing owls in accordance with “CDFW’s Staff Report on Burrowing Owl Mitigation”. Two surveys shall be conducted, the first 14 days prior to ground disturbing activities and the second within 24 hours immediately before ground disturbing activities. If burrowing owls are documented on-site, the Applicant shall prepare and implement a plan for avoidance or passive exclusion, in coordination with the California Department of Fish and Wildlife (CDFW). If no burrowing owls are observed onsite, no further review will be required.

Special-Status Plants

According to the CNDDDB and CNPS, thirty-nine (39) special-status plant species have been recorded in the San Bernadino North and Devore quadrangles. One special-status plant species was observed on-site during the field investigation: Southern California black walnut. Based on habitat requirements for specific species, the availability and quality of on-site habitats, and known occurrences, it was determined that the Project Site has a moderate potential to support Plummer's mariposa-lily (*Calochortus plummerae*), San Gabriel oak (*Quercus durata* var. *gabrielensis*), and Laguna Mountains jewelflower (*Streptanthus bernardinus*); and a low potential to support Nevin's barberry (*Berberis nevinii*), Catalina mariposa-lily (*Calochortus catalinae*), Palmer's mariposa-lily (*Calochortus palmeri* var. *palmeri*), La Panza mariposa lily (*Calochortus simulans*), Mesa horkelia (*Horkelia cuneata* var. *puberula*), California satintail (*Imperata brevifolia*), ocellated Humboldt lily (*Lilium humboldtii* ssp. *ocellatum*), California muhly (*Muhlenbergia californica*), San Gabriel ragwort (*Senecio astephanus*), Southern jewelflower (*Streptanthus campestris*), and San Bernadino aster (*Symphotrichum defoliatum*). It was further determined that the Project Site does not have potential to support the remainder of special-status plant species known to occur in the vicinity, and all are presumed to be absent.

Special-Status Wildlife:

According to the CNDDDB, sixty-one (61) special-status wildlife species have been reported in the San Bernadino North and Devore quadrangles. Three (3) special-status wildlife species were observed during the field investigation: Cooper's hawk, coastal whiptail, and Costa's hummingbird. Based on habitat requirements for specific species and the availability and quality of on-site habitats, it was determined that the Project Site and surrounding area have a high potential to support California glossy snake (*Arizona elegans occidentalis*), Bell's sage sparrow (*Artemisiospiza belli belli*), loggerhead shrike (*Lanius ludovicianus*), San Diego desert woodrat (*Neotoma lepida intermedia*), and coast horned lizard (*Phrynosoma blainvillii*); and a low potential to support southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*), southern California legless lizard (*Anniella stebbinsi*), great egret (*Ardea alba*), great blue heron (*Ardea herodias*), orangethroat whiptail (*Aspidoscelis hyperythra*), Crotch bumble bee (*Bombus crotchii*), northwestern San Diego pocket mouse (*Chaetodipus fallax fallax*), pallid San Diego pocket mouse (*Chaetodipus fallax pallidus*), San Bernadino ringneck snake (*Diadophis punctatus modestus*), Dulzura kangaroo rat (*Dipodomys simulans*), California horned lark (*Eremophila alpestris actia*), prairie falcon (*Falco mexicanus*), white cuckoo bee (*Neolarra alba*), coast patch-nosed snake (*Salvadora hexalepis virgulata*), yellow warbler (*Setophaga petechia*), and two-striped gartersnake (*Thamnophis hammondi*). It was further determined that the Project Site does not have potential to support the remainder of special-status wildlife species known to occur in the vicinity, and all are presumed to be absent.

Of the aforementioned species, Crotch bumble bee is a candidate for state listing. None of the other species are federally or state listed as endangered or threatened.

Special-Status Plant Communities

The California Natural Diversity Database lists three special-status habitats as being identified within the San Bernadino North and Devore quadrangles: Riversidian Alluvial Fan Sage Scrub, Southern Riparian Forest, and Southern Sycamore Alder Riparian Woodland. None of these special status habitats were observed as occurring within or near the Project Site.

Critical Habitat

Under the federal Endangered Species Act, "Critical Habitat" is designated at the time of listing of a species or within one year of listing. Critical Habitat refers to specific areas within the geographical range of a species at the time it is listed that include the physical or biological features that are essential to the survival and eventual recovery of that species. Maintenance of these physical and biological features requires special management considerations or protection, regardless of whether individuals or the species are present or not. All federal agencies are required to consult with the United States Fish and Wildlife Service (USFWS) regarding activities they authorize, fund, or permit which may affect a federally listed species or its designated Critical Habitat. The purpose of the consultation is to ensure that projects will not jeopardize the continued existence of the listed species or adversely modify or destroy its designated Critical Habitat. The designation of Critical Habitat does not affect private landowners, unless a project they are proposing is on federal lands, uses federal funds, or requires federal authorization or permits (e.g., funding from the Federal Highways Administration or a CWA Permit from the Corps). If there is a federal nexus, then the federal agency that is responsible for providing the funding or permit would consult with USFWS.

The Project Site is not located with federally designated Critical Habitat. The nearest designated Critical Habitat is located approximately 0.61 miles to the west for San Bernardino Merriam's kangaroo rat, beyond Meyers Canyon and existing residential development. Therefore, the loss or adverse modification of Critical Habitat will not occur as a result of project implementation and consultation with the USFWS will not be required for implementation of the Proposed Project.

In summary, potential impacts to any species identified as a candidate, sensitive, or special status species would be considered less than significant with the implementation of Mitigation Measure BR-1 and BR-2.

- b) **Less than Significant Impact.** The Project Site does not support riparian habitat or as discussed above, a sensitive natural community. Development of the Project Site as proposed would not result in impacts to riparian vegetation or to a sensitive natural community because these resources do not occur within the Project Site or within the area of Project impacts. Therefore, less than significant impact would occur, and no mitigation measures are required.
- c) **Less than Significant Impact with Mitigation Incorporated.** According to the BRA, the Project Site has one ephemeral drainage feature, Drainage 1, that was observed on-site during field investigation. Drainage 1 occurs in the eastern region of the Project Site and generally flows from north to south within site boundaries. Drainage 1 enters the site near the northeast corner, supported by the discharge waters of an upstream dam which consolidates flows from the San Bernardino mountains. From the northern boundary Drainage 1 flows southeast, briefly exiting the site through the eastern boundary before returning near the northeast corner, then exits again through the southern boundary. Flows within Drainage 1 are directed further southwest beyond site boundaries where they eventually join Cable Creek approximately 0.77 mile to the southwest of the Project Site. Drainage 1 flows for approximately 0.20 miles within the Project Site boundaries.

Drainage 1 is not a relatively permanent, standing, or continuously flowing body of water and, therefore, will not qualify as waters of the United States under the regulatory authority of the Corps (Sackett v. EPA (2022) 143 S. Ct. 1322, 1336). However, this feature does qualify as waters of the State and falls under the regulatory authority of the Regional Water Quality Control Board (RWQCB) and CDFW. Therefore, if the Proposed Project implementation is expected to impact Drainage 1, regulatory approvals will need to be obtained for the project. A Delineation of State and Federal Jurisdictional Waters was prepared to map the extent of potential impacts to Drainage 1 within the Project Site boundaries.

The Jurisdictional Delineation (JD) was prepared by ELMT Consulting, dated February 3, 2025 and is included as Appendix B-1. There were no features considered jurisdictional to the United States Army Corps of Engineers (USACE). The ephemeral channel recorded fall outside the jurisdiction of the USACE pursuant to Section 404 of the Clean Water Act. No USACE jurisdictional wetlands, isolated or otherwise, were identified within the project area.

The delineation indicates that Drainage 1 does meet the criteria to be considered jurisdictional under the RWQCB and CDFW. The total amount of impacts to Drainage 1 are shown in Appendix B-1 and estimated as follows.

RWQCB Jurisdiction	CDFW Jurisdiction	RWQCB Impacts	CDFW Impacts
0.10 acres (985 linear feet)	0.19 acres (985 linear feet)	0.02 acre (293 linear feet)	0.07 acres

Therefore, the following mitigation measures are recommended for the project to compensate for the impact on Drainage 1. Mitigation Measure BR-3 would reduce impacts by regulating any activity that would divert or obstruct the natural flow or alter the bed, channel, or bank of a river through a Streambed Alteration Agreement (SAA) as required by CDFW. Approval of the SAA by CDFW would demonstrate the Project's compliance with measures that would reduce impacts to a less than significant level.

Mitigation Measure BR-3:

Prior to the issuance of a grading permit, the project applicant shall obtain a Streambed Alteration Agreement under Section 1602 of the California Fish and Game Code from CDFW and a Report of Waste Discharge from the RWQCB.

- d) **Less than Significant Impact.** Habitat linkages provide connections between larger habitat areas that are separated by development. Wildlife corridors are similar to linkages but provide specific opportunities for animals to disperse or migrate between areas. A corridor can be defined as a linear landscape feature of sufficient width to allow animal movement between two comparatively undisturbed habitat fragments. Adequate cover is essential for a corridor to function as a wildlife movement area. It is possible for a habitat corridor to be adequate for one species yet still inadequate for others. Wildlife corridors are features that allow for the dispersal, seasonal migration, breeding, and foraging of a variety of wildlife species. Additionally, open space can provide a buffer against both human disturbance and natural fluctuations in resources. As mapped by the San Bernardino Countywide Plan the Project Site is located within the northeast periphery of the Cajon Pass, which is identified as a Major Open Space. Open space within the Cajon Pass serves to connect habitats between the San Gabriel Mountains in the northwest, Cajon Creek to the north, San Bernardino Mountains to the northeast, and Santa Ana River to the south. While the Project Site is generally removed from the active wash of Cajon Creek by existing urban development, Interstate 15, and associated infrastructure, a narrow linkage between the site and the bulk of Cajon Pass Major Open Space persists within Meyers Canyon, which occurs within and adjacent to the western limits of the Project Site and is tributary to Cajon Creek via a series of ephemeral drainages and flood control channels. In addition, undeveloped land in the northern portion of the site merges with open space to the west, north and east. While portions of the Project Site occur within and adjacent to Meyers Canyon, the Project has been designed to avoid impacts to habitats within the canyon as no portion of the development will encroach into the canyon. In addition, no impacts to the creek itself are expected to occur. As such, no long-term impacts to wildlife movement opportunities are expected to occur due to project implementation. Therefore, less than significant adverse impacts have been identified or are anticipated and no mitigation measures are required.
- e) **Less than Significant Impact.** According to the City of San Bernardino General Plan Figure NRC-2, the Project Site is located within a Biological Resource Area. The eastern portion of the Project Site, outside of the proposed limits of disturbance, support a sycamore woodland plant community that coincides with the occurrence of Drainage 1. This plant community is dominated by western sycamore (*Platanus racemosa*) and supports a dense canopy layer, open

shrub layer, and robust herbaceous layer. Common plant species observed in this plant community include southern California black walnut, Mexican elderberry, canyon live oak (*Quercus chrysolepis*), deerweed, California sagebrush, mule fat (*Baccharis salicifolia*), ripgut brome (*Bromus diandrus*), red brome (*Bromus rubens*), downy chess (*Bromus tectorum*), common cryptantha (*Cryptantha intermedia*), eucalyptus (*Eucalyptus sp.*), common sunflower, white horebound (*Marrubium vulgare*), and poison oak (*Toxicodendron pubescens*). This plant community is located outside of the proposed limits of disturbance, therefore, impacts to this are not expected to occur through Proposed Project implementation.

- f) **No Impact.** The Project Site is not located within the planning area of an adopted Habitat Conservation Plan, Natural Community Plan, or other approved, local regional, or state habitat conservation plan as identified in the California Department of Fish and Wildlife's California Natural Community Conservation Plans Map (April 20219).⁵ No impacts are identified or are anticipated, and no mitigation measures are required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES – Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☒	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐

Discussion:

- a) **Less than Significant.** A Phase I Cultural Resources Investigation dated August 14, 2024, updated February 20, 2025, was prepared for the Project Site by Brian F. Smith and Associates, Inc. (BFSI). Findings of the report are summarized herein and it is included as Appendix C. The purpose of the assessment was to identify and document any cultural resources that may potentially occur within the Project Site. The investigation was completed for compliance with the California Environmental Quality Act (CEQA), as amended, the San Bernardino County policies and guidelines. Historic land use data was compiled by BFSI Environmental Services through institutional records search, archival research, an intensive cultural resource survey of the entire approximately 107.7-acre study area, and the preparation of a technical report.

Research confirms no federally listed historical resources are identified in the immediate vicinity. The earliest available aerial photograph of the project area was taken in 1930 and indicates that the southern portion of the property was being used for agriculture, as evidenced by plowed and

⁵ <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline>. Accessed September 6, 2024.

tilled swaths of land, while the northern portion of the property appears undeveloped. Structures within the boundaries of Site SBR-7045H can be seen in the south-central portion of the property along a line of trees. Several dirt roads provide access to the agricultural fields and structures throughout the southern portion of the property and are present, but less extensive, in the northern portion of the property. A 1937 aerial photograph depicts these fields, structures, and roads in greater detail. Between 1930 and 1953 (Plate 3.2–4), the property appears relatively unchanged, with only minor changes to the layout of the dirt roads. By 1980, the agricultural fields within the property appear barren and the structures associated with SBR-7045H are no longer visible. Subsequent aerial photographs demonstrate that the property remained vacant and relatively unchanged throughout the 1980s until the present day, with periodic grading and clearing occurring in the southern portion of the project. BFSa staff located previously recorded historic Site SBR-7045H and recorded and evaluated its present condition. SBR-7045H was first recorded in September 1991, during a cultural resources survey conducted by Robin E. Laska and Mark T. Swanson of Research Associates (Laska and Swanson 1991). Laska and Swanson (1991) noted that the site exhibited “heavy disturbance” due to previous cultivation and modern vehicle use. As a result, SBR-7045H was recorded as not significant and ineligible for listing on the National Register of Historic Places. Further archaeological testing was not recommended; however, due to the possibility of buried cultural resources, Laska and Swanson (1991) recommended archaeological monitoring for any future earthmoving activities within the project area.

In 2004, SBR-7045H was re-evaluated as part of a cultural resources survey for APN 0348121-14 conducted by CRM Tech (Tang et al. 2004). This study renumbered several of the features and updated the site to include four additional features. These additional features included an earthen reservoir (Feature 4), two stacked rock walls (Features 5 and 6), and a refuse scatter (Feature 8) (Tang et al. 2004). The metal irrigation pipes recorded as Features 5 and 6 by Laska and Swanson in 1991 were noted during the 2004 study but were not re-evaluated or assigned new numbers because they were outside of the APE. The 2004 study evaluated Site SBR7045H as not CEQA significant and ineligible for listing on the CRHR (Tang et al. 2004).

- b) **Less Than Significant with Mitigation.** An archaeological records search was completed for this investigation at the California State University, Fullerton South Central Coast Information Center (SCCIC). The research confirmed three resources investigations within one-half mile of the subject property, none of which are located within the project boundaries. The complete records search results can be found in the Phase I Cultural Resources Investigation.

Field archaeologists David Grabski and Alexander Brill conducted the intensive pedestrian survey on July 16 and 17, 2024, under the direction of Principal Investigator Tracy A. Stropes, M.A., RPA. Ground visibility was generally good in the southern half of the project (approximately 80 to 90 percent ground visibility) and poor in the northern half of the project (approximately 10 percent ground visibility). The southern half of the project was grubbed and cleared, therefore, vegetation within this portion of the project was sparse and limited to low-lying scrubs and grasses. Vegetation in the northern portion of the project was dense and consisted of inland sage scrub). The field survey did not result in the identification of any new or unrecorded cultural resources.

Although aerial photographs indicate that the property has been vacant since as early as 1930, the recorded foundation is visible on the 1953 aerial photograph, additionally, archival research indicated that the subject property is located within an area of high probability for the potential to discover buried historic and prehistoric cultural resources. However, the removal of Site SBR-7045H will not constitute an adverse impact because it has been evaluated as not CEQA-significant and is not eligible for listing on the CRHR. While the subject property has been

continually disturbed by agricultural activities throughout the twentieth century, the presence of SBR-7045H indicates that there is a potential to encounter historic bedrock outcrops and an unnamed wash in the southeast corner of the project indicates that there is potential for the discovery of previously unrecorded prehistoric cultural resources, particularly in the undeveloped northern portion of the project. Therefore, it is recommended that archaeological monitoring is recommended for any earth disturbing activities within the project area.

Mitigation Measure CUL-1 Archaeological Monitoring:

An archaeological monitor with at least 3 years of regional experience in archaeology shall be present for the initial clearing of the property and then periodically, as determined by the project archaeologist. The Principal Investigator (PI) may submit a detailed letter to the City of San Bernardino during earthwork to inform the City and the Consulting Tribes, including Yuhaaviatam of San Manuel Nation Cultural Resources Management Department (YSMN), of a modification to the monitoring program when field conditions require a change in monitoring status. The suspension of archaeological monitoring will be determined in consultation with the Consulting Tribes. After the initial grading, the Project Archaeologist, in consultation with the Lead Agency and YSMN, may reevaluate the requirements of archaeological monitoring during ground-disturbing activities based on the conditions present at the project site.

Mitigation Measure CUL-2 Finding of Resources:

Should unanticipated or inadvertent surface and/or subsurface prehistoric or historic archaeological resources, built environment, and/or tribal cultural resources appear to be encountered during construction or maintenance activity associated with this project, then all work must halt within a 60-foot radius of the discovery until a qualified professional can evaluate the discovery. The archaeologist shall have the authority to modify the no-work radius as appropriate, using professional judgment. If the discovered resource is associated with the prehistoric Native American occupation of this area, the Consulting Tribes, including YSMN shall be contacted to review and participate in the evolution of the discovered resource.

If the resource is significant, the Principal Investigator (PI) shall submit an Archaeological Data Recovery Program (ADRP). An ADRP is a standard plan that would report and disseminate results, as well as interpretation of what has been learned so that it is understandable and accessible to the public. Professional standards for an ADRP shall be followed (refer to Appendix C). Appropriate arrangements for curation of archaeological materials and records should be made to the Lead Agency (City) and YSMN to review and approve. Impacts to significant resources must be mitigated before ground disturbing activities in the area of discovery will be allowed to resume. If the resource is not significant, the archaeologist shall submit a letter to the City indicating that artifacts will be collected, curated, and documented in the final monitoring report. The letter shall also indicate that no further work is required.

With implementation of Mitigation Measures CUL-1 and CUL-2, and Mitigation Measures TCR-1 through TCR-5, the Proposed Project would not have a significant impact on undiscovered historical or prehistoric resources.

- c) **Less than Significant with Mitigation Incorporated.** Research provided by BFSA's report did not result in any evidence of human remains within the Project Site, but the presence cannot be completely ruled out. Construction activities, particularly grading, could potentially disturb human remains interred outside of a formal cemetery. Thus, the potential exists that human remains may be unearthed during grading and excavation activities associated with project construction.

California state law (California Health & Safety Code § 7050.5) and federal law and regulations ([Archaeological Resources Protection Act (ARPA) 16 USC 470 & 43 CFR 7], [Native American Graves Protection & Repatriation Act (NAGPRA) 25 USC 3001 & 43 CFR 10] and [Public Lands, Interior 43 CFR 8365.1-7]) require a defined protocol if human remains are discovered in the State of California regardless if the remains are modern or archaeological. Mitigation Measure CUL-3 shall be implemented.

Mitigation Measure CUL-3 Human Remains:

Should human remains and/or cremations be encountered during any earthmoving activities, all work shall stop immediately in the area in which the find(s) are present (no less than 100-ft radius area around the remains and project personnel will be excluded from the area and no photographs will be permitted), and the County of San Bernardino Coroner will be notified. The County of San Bernardino and the Project Proponent shall also be informed of the discovery. The Coroner will determine if the bones are historic/archaeological or a modern legal case. The Coroner will immediately contact the Native American Heritage Commission (NAHC) in the event that remains are determined to be human and of Native American origin, in accordance with California Public Resources Code Section § 5097.98.

All discovered human remains shall be treated with respect and dignity. If the remains are determined to be human, the Coroner will determine their origin: Native American; archaeological but non-Native American; or forensic. If determined to be of Native American origin, the Coroner will contact/notify the Native American Heritage Commission and the Most Likely Descendant (MLD) will be identified. In consultation between the MLD, Lead Agency, and property owner, the disposition of the remains will be determined. Any costs incurred would be the responsibility of the property owner. If the human remains are archaeological (non-Native American), the archaeological consultant will manage the removal, analysis, and reporting. The remains will be reinterred off-site and any costs incurred would be the responsibility of the property owner. If the remains are determined to be of forensic value, the Coroner will arrange for the removal and analysis. The City will assume responsibility of the remains and the property owner will not be responsible for any related costs.

Therefore, with the implementation of Mitigation Measure CUL-3, the Proposed Project would be anticipated to result in a less than significant impact.

Potentially
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Less Than
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VI. ENERGY – Would the project:

- a) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy resources, during project construction or operation? ☐ ☐ ☒ ☐
- d) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? ☐ ☐ ☒ ☐

Discussion:

- a) **Less than Significant Impact.**

Fuel

During the construction of the Proposed Project, transportation energy consumption is dependent on the type of vehicles used, number of vehicle trips, vehicle miles traveled, fuel efficiency of vehicles, and travel mode. Temporary transportation fuel use such as gasoline and diesel during construction would result from the use of delivery vehicles and trucks, construction equipment, and construction employee vehicles. Additionally, most construction equipment during grading would be powered by gas or diesel. Based on output from CalEEMod 2022 (see Appendix A), the Proposed Project construction activities would consume an estimated 455,769.90 gallons of diesel fuel for operation of heavy-duty equipment. Tables 6 through 8 show the modeled fuel consumption for all construction activities.

Table 6
Construction Equipment Fuel Consumption Estimates

Phase	Number of Days	Offroad Equipment Type	Amount	Hours per Day	Horsepower	Load Factor	Total Fuel Consumption (gal diesel fuel) ¹
Demolition	200	Concrete/Industrial Saws	1	8	33	0.73	2173.25
	200	Rubber Tired Dozer	2	8	367	0.4	24850.30
	200	Excavators	3	8	36	0.38	3048.19
Site Preparation	120	Rubber Tired Dozer	3	8	367	0.4	22365.27
	120	Tractors/Loaders/Backhoes	4	8	84	0.37	5689.96
Grading	310	Graders	1	8	148	0.41	49346.84
	310	Excavators	2	8	36	0.38	2833.75
	310	Rubber Tired Dozer	1	8	367	0.4	19258.99
	310	Tractors/Loaders/Backhoes	3	8	84	0.37	11024.29

Phase	Number of Days	Offroad Equipment Type	Amount	Hours per Day	Horsepower	Load Factor	Total Fuel Consumption (gal diesel fuel) ¹
Building Construction	3100	Cranes	1	7	367	0.29	84258.06
	3100	Forklifts	3	8	82	0.2	71745.41
	3100	Generator Sets	1	8	14	0.74	15107.37
	3100	Tractors/Loaders/Backhoes	3	7	84	0.37	118970.51
	3100	Welders	1	8	46	0.45	30185.57
Paving	220	Pavers	2	8	81	0.42	7041.32
	220	Paving Equipment	2	8	89	0.36	5966.10
	220	Rollers	2	8	36	0.38	2831.43
Architectural Coating	25	Air Compressors	1	6	37	0.48	13,78.46
Total Fuel Used in Gallons							455,769.90

Table 7
Construction Worker Fuel Consumption Estimates

Phase	Number of Days	Worker Trips/Day	Trip Length (miles)	Fuel Consumption (gallons) ¹
Demolition	200	15	18.5	2312.50
Site Preparation	120	17.5	18.5	1618.75
Grading	310	20.0	18.5	4779.17
Building Construction	3100	41.4	18.5	98928.75
Paving	220	15	18.5	2543.75
Architectural Coating	25	8.28	18.5	159.56
Total Construction Worker Fuel Consumption				108,029.98

Table 8
Construction Vendor Fuel Consumption Estimates

Phase	Number of Days	Worker Trips/Day	Trip Length (miles)	Fuel Used (gallons)
Demolition	200	--	10.2	--
Site Preparation	120	--	10.2	--
Grading	310	--	10.2	--
Building Construction	3100	12.3	10.2	52,557.57
Paving	220	--	10.2	--
Architectural Coating	25	--	10.2	--
Total Construction Vendor Fuel Consumption				52,557.57

Construction workers, hauling truck, and vendor fuel consumption are based on CalEEMod's default data for vehicles miles traveled (VMT). As shown in Table 7, all construction worker trips are from light duty autos, it is estimated 108,029.08 gallons of fuel will be consumed. Fuel consumption from construction vendor (material delivery) trips is 52,557.57 gallons, as shown on Table 8. Fuel consumption from hauling trucks was calculated to be zero. Construction would represent a "single-event" diesel and gasoline fuel resources. Impacts related to transportation

energy use during construction would be temporary and would not require the additional use of energy supplies or the construction of new infrastructure.

During operations of the Proposed Project, fuel consumption would result from resident vehicle trips. Project vehicle miles traveled (VMT) were modeled with an automobile fuel efficiency of 24 miles per gallon. The Proposed Project would result in an estimated 2,925,312 gallons of fuel consumption per year based on the model default value of 5,850,624 miles driven.

Trip generation and VMT generated by the Proposed Project were considered less than significant. The Proposed Project does not include uses or operations that would inherently result in excessive or wasteful vehicle trips and VMT or associated wasteful vehicle energy consumption. It is not expected to result in a substantial demand for energy that would require expanded supplies or the construction of other infrastructure or expansion of existing facilities.

Electricity

Southern California Edison (SCE) currently provides electrical service to the project area. The demand for electricity associated with the Proposed Project would be for operation of the 105 single-family residential units. In 2022, the Residential sector of the Southern California Edison planning area consumed 39,400.222464 GWh of electricity.⁶ Based on the CalEEMod emission output tables for the Proposed Project, the estimated electricity demand is 35,983.17 GWh (see Appendix A). The Proposed Project's estimated annual electricity consumption compared to the 2022 annual electricity consumption of the overall Industry Sector in the SCE Planning Area would account for approximately 0.0015816 percent of total electricity consumption. The existing SCE electrical facilities have the capacity to meet this increased demand. Therefore, the increase in electricity demand from the Proposed Project would be insignificant compared to the projected electricity demand for SCE's Residential sector demand. Less than significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

Natural Gas

The Project Site is located within the service area of Southern California Gas (SoCal Gas). The Project Site is primarily vacant and does not have a current demand for natural gas. The Proposed Project would therefore create a permanent increase demand for natural gas if not designed as "all electric". The Proposed Project's conservatively estimated annual natural gas demand based on CalEEMod output would be 3,598,317 therms per year. According to the California Energy Commission, the natural gas consumption of the SoCal Gas's residential sector was approximately 0.875107 million therms in 2022.⁷ The Proposed Project's estimated annual natural gas consumption, compared to the 2022 annual natural gas consumption of the overall residential sector in the SoCal Gas Planning Area would account for approximately 0.0022211 percent of the total natural gas consumption. Therefore, projected natural gas demand would not significantly impact SoCal Gas's level of service.

In conclusion, neither the construction nor operation of the Project would result in wasteful, inefficient, or unnecessary consumption of energy or wasteful use of energy resources. Therefore,

⁶ California Energy Commission. California Energy Consumption Database. <https://ecdms.energy.ca.gov/Default.aspx>. Accessed September 26, 2024.

⁷ California Energy Commission. <https://ecdms.energy.ca.gov/Default.aspx>. Accessed September 26, 2024.

impacts related to wasteful energy use would be less than significant. Less than significant adverse impacts are identified or anticipated, and no mitigation measures are required.

- b) **Less than Significant Impact.** The California Energy Commission (CEC) updates the Energy Code every three years, which includes Title 24. On August 11, 2021, the CEC adopted the 2022 Energy Code. In December 2021, it was approved by the California Building Standards Commission for inclusion into the California Building Standards Code. The 2022 Energy Code encourages efficient electric heat pumps, establishes electric-ready requirements for new homes, expands solar photovoltaic and battery storage standards, strengthens ventilation standards, and more. Buildings whose permit applications are applied for on or after January 1, 2023, must comply with the 2022 Energy Code.⁸

Project design and operation would comply with the Regional Greenhouse Gas Reduction Plan of San Bernardino County 2021 which the City relies on until their own plan is adopted, as well as the State Building Energy Efficiency Standards related to appliance efficiency regulations, and green building standards. The Proposed Project is required to adhere to the Regional Greenhouse Gas Emissions Reduction Plan and Title 24 order to help decrease energy consumption and GHG emissions, and to become a more sustainable community and to meet the goals of AB 32.⁹ The Proposed Project would not conflict with any applicable plan, policy or regulation of an agency adopted to reduce GHG emissions, including Title 24, AB 32, and SB 32. The Proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency and therefore less than significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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VII. GEOLOGY AND SOILS – Would the project:

- a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map Issued by the State Geologist for the area or based on other substantial evidence of a known fault? | ☐ | ☐ | ☒ | ☐ |
| ii) Strong seismic ground shaking? | ☐ | ☐ | ☒ | ☐ |
| iii) Seismic-related ground failure, including liquefaction? | ☐ | ☐ | ☒ | ☐ |

⁸ 2022 Building Energy Efficiency Standards. <https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2022-building-energy-efficiency> . Accessed February 15, 2024.

⁹ San Bernardino County. Regional Greenhouse Gas Reduction Plan. chrome-extension://efaidnbmnnnibpcjpcglclefindmkaj/https://www.gosbcta.com/wp-content/uploads/2019/09/San_Bernardino_Regional_GHG_Reduction_Plan_Main_Text_Mar_2021.pdf

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
iv) Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18 1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

Discussion:

a)

- i. **Less than Significant Impact.** An Updated Geotechnical Report, dated October 1, 2024, was prepared by Geotek, Inc and is summarized herein. The report is included as Appendix D. According to the updated Geotechnical Report, the closest known active fault to the site is the San Andreas fault, located approximately 300 feet to the north. The presence of the fault was reported to be interpreted from aerial photographs or by direct observation of the offset drainage, aligned vegetation, incised hills, etc. According to the City of San Bernardino General Plan Figure S-3 Alquist-Priolo Study Zones and Figure S-4 Regional Faults, and the California Department of Conservation Earthquake Zones of Required Investigations Map, shows that the Project Site is partially within an Alquist-Priolo Earthquake Fault Zone. No evidence of active faulting was identified in the proposed residential development area of the site by LGC (2005) within the limits of their Fault Trenches 1, 2 and 3. The Geotechnical Report concurs with this conclusion provided by LGC (2005). The Geotechnical Report does recommend the implementation of restricted use setback zones for habitable structures at this time. The Geotechnical Report states that strong geomorphic evidence of lineaments (linear features attributed to faults or fractures) was present just north of the Project Site with the mapped location of the San Andreas fault. However, there is no evidence of active faulting that was observed in fault trenches excavated on the site. The Geotechnical Report stated that based on interpretation, the splay is older than 11,000 years as evidenced by the lack of right lateral offsets within the alluvial fan deposits or very old alluvial fan deposits and by the apparent lack of expression within the younger alluvial materials. The

Geotechnical Report stated that as a result of this accumulation of data, the splay is not interpreted as being active and therefore, no structural setback was required or recommended. Therefore, less than significant adverse impacts are identified or anticipated, and no mitigation measures are required.

- ii. **Less than Significant Impact.** As is the case for most areas of Southern California, strong seismic ground shaking resulting from earthquakes associated with nearby faults may occur at the Project Site. Strong seismic ground shaking can be expected to induce lower horizontal accelerations due to smaller anticipated earthquakes during the lifetime of the proposed structures. The Geotechnical Report provided seismic design parameters for the project based on a Site Class “D” and the 2022 California Building Code Development of the Project Site would take place in accordance with the applicable requirements listed in the International Building Code (IBC), the California Building Standards Code, and the Buildings and Construction requirements of the City of San Bernardino Municipal Code. Therefore, less than significant adverse impacts are identified or anticipated, and no mitigation measures are required.
- iii. **Less than Significant Impact.** Liquefaction involved the substantial loss of shear strength in saturated soil, usually taking place within a soil medium exhibiting a uniform, fine grained characteristic, loose consistency and low confining pressure when subjected to impact by seismic or dynamic loading. Factors influencing a Project Site’s potential for liquefaction include seismicity, onsite soil type, and consistency and groundwater level. The Geotechnical Report reported that the potential for earthquake induced liquefaction at the Project Site was considered very low to remote due to the relatively deep groundwater and the dense nature of the deeper on-site soils. The Geotechnical Report did not provide an estimate of anticipated seismic (“dry sand”) settlement potentials. The Project Site is not mapped within an area identified by the County of San Bernardino for liquefaction (FH22C_20100309.pdf (sbcounty.gov)). Due to the relatively dense nature of the alluvial materials underlying the Project Site and lack of shallow groundwater, the potential for liquefaction and seismic induced (“dry sand”) settlement at the Project Site is very low. Therefore, less than significant impacts are identified or anticipated, and no mitigation measures are required.
- iv. **Less than Significant Impact.** As identified in Figure S-7, Slope Stability and Major Landslides of the City of San Bernardino General Plan, the Project Site is located within an area identified as having low to moderate relief and has a low to moderate susceptibility to landslides. The Geotechnical Report states that no strong geomorphic lineaments were interpreted to project through the site during the review of aerial photographs. However, strong geomorphic evidence was present just north of the site, coinciding with the San Andreas fault. Geomorphic evidence of active landsliding was not observed on-site. Therefore, less than significant adverse impacts are identified or anticipated, and no mitigation measures are required.
- b) **Less than Significant Impact.** During the development of the Project Site that would include disturbance of approximately 107.7 acres, project-related dust may be generated due to the operation of machinery on-site or due to high winds. Additionally, erosion of soils could occur due to a storm event. Development of the Proposed Project would disturb more than one-acre of soil; therefore, the Proposed Project is subject to the requirements of the State Water Resources Control Board General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit Order 2009-2009-DWQ). Construction activity subject to this permit includes clearing, grading, and disturbances to the ground such as stockpiling or excavation. The Construction General Permit requires the development and implementation of a Storm Water Pollution and Prevention Plan (SWPPP). The SWPPP must list Best Management Practices

(BMPs) to avoid and minimize soil erosion. Adherence to BMPs is anticipated to ensure that the Proposed Project does not result in substantial soil erosion or the loss of topsoil. Less than significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

- c) **Less than Significant Impact.** As previously mentioned, the Project Site is not located within a landslide susceptible zone, the nearest landslide zone is approximately 0.32 miles north of the Project Site.¹⁰ The Geotechnical Report states that the potential for secondary seismic hazards such as a seiche and tsunami is considered to be remote due to site elevation and distance from an open body of water. Due to the absence of a nearby free-face and the very low liquefaction hazard, the potential for lateral spreading is considered to be nil. Less than significant adverse impacts are identified or are anticipated, and no mitigation measures are required.
- d) **Less than Significant Impact.** Expansive (or shrink-swell) soil behavior is attributable to the water-holding capacity of clay minerals and can adversely affect the structural integrity of facilities including underground pipelines. According to the Geotechnical Report, a sample of the subsurface soil was tested for expansive potential and test results identified an expansion index between 0-20, which indicates “very low” expansion index. The Geotechnical Report and recommendations are subject to approval by the City Engineer. The Proposed Project shall also adhere to the 2022 California Building Code. Therefore, less than significant impacts are identified or anticipated, and no mitigation measures are required.
- e) **No Impact.** The Proposed Project is expected to connect to the City’s sewer collection system, which currently provides service to the surrounding vicinity and would not require the use of septic tanks or alternative wastewater disposal systems; therefore, no impacts are identified or anticipated, and no mitigation measured are required.
- f) **Less than Significant.** A Paleontological Assessment report, dated August 14, 2024, was prepared for the Proposed Project by BFS&A Environmental Services, a Perennial Company. The report is summarized herein and included as Appendix E. While the Pleistocene-aged old and very old alluvial fan deposits are of sufficient geologic age to potentially contain fossils, their sedimentological structure and geologic context strongly suggest that their paleontological potential is low. These deposits, including the younger Holocene sequences, are likely the result of instantaneous, catastrophic flows of coarse, bouldery debris that originated from the mountain flanks during intense storm events. While a relatively rapid burial in fine-grained sediments is usually the typical scenario for preserving animal bones to become future fossils (on the order of months of time), debris flow deposits with cobbles and boulders would probably destroy any bones that happened to be present on the surface. Based on the data and conclusions presented, monitoring for paleontological resources at the project is not recommended. A paleontological resource impact mitigation program (PRIMP) is not warranted, and no mitigation is required.

¹⁰ San Bernardino Countywide Plan. “HZ-2: Liquefaction and Landslides.” October 2020. Accessed July 12, 2024.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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VIII. GREENHOUSE GAS EMISSIONS – Would the project:

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? | ☐ | ☐ | ☒ | ☐ |
| b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | ☐ | ☐ | ☒ | ☐ |

Discussion:

- a) **Less than Significant Impact.** Gases that absorb and re-emit infrared radiation in the atmosphere are called greenhouse gases (GHGs). GHGs are present in the atmosphere naturally and can be released by natural sources (such as oceanic water vapor) or are formed from secondary reactions taking place in the atmosphere. The gases that are widely seen as the principal contributors to human-induced climate change include carbon dioxide (CO₂), methane (CH₄), nitrous oxides (N₂O), fluorinated gases such as hydrofluorocarbons (HFCs) and perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆). Water vapor is excluded from the list of GHGs because it is short lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation. The Proposed Project's emissions were compared to SCAQMD draft screening threshold of 3,000 MTCO₂e.

Greenhouse gas emissions were estimate using CalEEMod version 2022. The emissions incorporate certain design reduction strategies. These design reduction strategies could include methods for improving the Projects Site's walkability by providing sidewalks. The CalEEMod outputs used to estimate construction and operational greenhouse gas emissions are referred to in Table 9 and 10 below.

For construction phase Project emissions (Table 8), GHGs are quantified and amortized over the life of the Project. To amortize the emissions over the life of the Project, SCAQMD recommends calculating the total greenhouse gas emissions for the construction activities, dividing it by a 30-year project life then adding that number to the annual operational phase GHG emissions. Therefore, construction emissions were amortized over a 30-year period and added to the annual operational phase GHG emissions.

Table 9
Greenhouse Gas Construction Emissions
(Metric Tons per Year)

Source/Phase	CO ₂	CH ₄	N ₂ O	R1
Annual Max	791	0.0	0.0	0.1
Total (MTCO₂e)	794			
Amortized over 30 years	26.5			

Source: CalEEMod.2022 Annual Emissions

Table 10
Greenhouse Gas Operational Emissions
(Metric Tons per Year)

Source/Phase	CO ₂	CH ₄	N ₂ O	R1
Mobile	2,091	0.0	0.1	3.3
Area	37.5	0.0	0.0	--
Energy	328	0.0	0.0	--
Water	28.7	0.2	0.0	--
Waste	9.9	1.0	0.0	--
Refrigeration	--	--	--	0.3
MTCO ₂ e per Year	2,563			
Construction Amortized over 30 years	26.5			
Total MTCO₂e per Year	2,589.5			
SCAQMD Threshold	3,000			
Significant	No			

Source: CalEEMod.2022 Annual Emissions.

As shown above, the Proposed Project's emissions would not exceed the SCAQMD's 3,000 MTCO₂e threshold of significance. Therefore, less than significant adverse impacts are identified or anticipated, and no mitigation measures are required.

- b) **Less than Significant Impact.** The SCAQMD's thresholds used the California Governor Executive Order S-3-05 goals as the basis for deriving the screening level. The Proposed Project's emissions meet the threshold for compliance with Executive Order S-3-05, the Proposed Project's emissions also comply with the goals of AB 32. Additionally, as the Proposed Project meets the current interim emissions targets/thresholds established by the SCAQMD (as described in Section III Air Quality of this Initial Study), the Proposed Project would also be on track to meet the reduction target of 40 percent below 1990 levels by 2030 as mandated by SB 32. Furthermore, all post-2020 reductions in GHG emissions are addressed via regulatory requirements at the State level and the Proposed Project would be required to comply with these regulations as they come into effect. As discussed, the Proposed Project's GHG emissions fall below the Tier 3 SCAQMD draft screening threshold of 3,000 metric tons of CO₂ equivalent per year and the Proposed Project would follow the reduction goals AB 32 and SB 32.

The California Air Resources Board 2022 Scoping Plan assesses progress toward the statutory target of reducing GHG emissions to 40 percent below 1990 levels by 2030, while laying out a path to achieving carbon neutrality no later than 2045. The 2022 Scoping Plan focuses on outcomes needed to achieve carbon neutrality by assessing paths for clean technology, energy deployment, natural and working lands, and others, and is designed to meet the State's long-term climate objectives and support a range of economic, environmental, energy security, environmental justice, and public health priorities. All of the post-2020 reductions in GHG emissions are addressed via regulatory requirements at the State level, and the Proposed Project would be required to comply with these regulations as they come into effect.

The Proposed Project would comply with the CALGreen Code, regarding energy conservation and green building standards. Therefore, the Proposed Project would comply with applicable energy also comply with the CALGreen Code, which includes a variety of different measures, including the reduction of wastewater and water use. In addition, the proposed Project would be required to comply with the California Model Water Efficient Landscape Ordinance. Therefore, the proposed Project would not conflict with any of the water conservation and efficiency measures. Vehicles traveling to the Project site would comply with the Pavley II (LEV III) Advanced Clean Cars Program. Therefore, the proposed Project would not conflict with the identified transportation and motor vehicle measures. Implementation of the proposed Project would not conflict with existing plans, policies, and regulations adopted for the purpose of reducing the emissions of greenhouse gas with the 2022 Scoping Plan.

Therefore, the Proposed Project would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases. Less than significant adverse impacts are identified or anticipated and no mitigation measures are required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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IX. HAZARDS AND HAZARDOUS MATERIALS

– Would the project:

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? | ☐ | ☐ | ☒ | ☐ |
| b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? | ☐ | ☐ | ☒ | ☐ |
| c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? | ☐ | ☐ | ☒ | ☐ |
| d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? | ☐ | ☐ | ☒ | ☐ |
| e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard | ☐ | ☐ | ☒ | ☐ |

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
for people residing or working in the project area?				
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☒	☐	☐

- a) **Less than Significant Impact.** The Proposed Project is a residential TTM subdivision development of 105 single family residences. Construction of the Proposed Project would require the routine transport, use, storage, and disposal of limited quantities of common hazardous materials such as gasoline, diesel fuel, oils, solvents, paint, fertilizers, pesticides, and other similar materials. All materials required during construction would be kept in compliance with State and local regulations and BMPs. Although these materials could be stored on-site during construction activities, the Proposed Project would be required to comply with the guidelines established by the SWPPP. The management of hazardous materials during the Proposed Project's construction phase would not result in a significant impact.

Operations would include standard maintenance (i.e., landscape upkeep, exterior painting and similar activities) involving the use of commercially available products (e.g., pesticides, herbicides, gas, oil, paint, etc.) the use of which would not create a significant hazard to the public. Impacts from operations would be less than significant. Hazardous materials are highly regulated in California, including the methods in which they are transported, used and stored. Residential development would not result in the transport, use or storage of significant quantities of hazardous materials. The City relies on the assistance of the County Fire Department and Department of Environmental Health in the regulation of hazardous materials. Therefore, a less than significant impact is anticipated, and no mitigation measures are required.

- b) **Less than Significant Impact.** Through the construction process, any hazardous materials used on-site would be handled and stored in accordance with all Federal, State, County, and City regulations. Future residences would store and use various chemicals for routine housekeeping and landscaping maintenance. However, none of these chemicals would be used in sufficient quantities to pose a threat to humans or the environment. Because quantities of hazardous materials used and stored on-site would be minimal, a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials is not anticipated. As any hazardous materials would be delivered, handled, and stored in compliance with all Federal, State, County and City regulations, a less than significant impact is anticipated, and no mitigation measures are required.

- c) **Less than Significant Impact.** The nearest school to the Project Site is North Verdmont Elementary School, located approximately 0.4 miles south of the Project Site and Cesar Chavez Middle School, located approximately 0.5 miles southeast of the Project Site. The Proposed Project would not require the routine transport or use of hazardous materials. No schools exist within a quarter-mile of the Project Site. Therefore, a less than significant impact is anticipated, and no mitigation measures are required.
- d) **Less than Significant Impact.** The Project Site is not included on a list of hazardous material sites as compiled pursuant to Government Code Section 65962.5 and reported in the Department of Toxic Substances Control EnviroStor database.¹¹ In the event that hazardous materials are identified on the Project Site during construction, standard reporting and remediation regulations would apply. Therefore, a less than significant impact is anticipated, and no mitigation measures are required.
- e) **Less than Significant Impact.** According to the City of San Bernardino General Plan, the Project Site occurs outside the San Bernardino International Airport (SBIA) Influence Area.¹² The SBIA is located approximately 9.5 miles southeast of the Project Site. Therefore, implementation of the Proposed Project would not result in a safety hazard related to airport land uses for people residing or working in the area. Therefore, a less than significant impact is anticipated, and no mitigation measures are required.
- f) **Less than significant Impact.** The Project Site does not contain any emergency facilities. The City of San Bernardino General Plan does not identify the Project Site or the vicinity as an emergency evacuation area. During construction, the contractor would be required to maintain adequate emergency access for emergency vehicles as required by the City of San Bernardino. Project operations would not interfere with any adopted emergency response or evacuation plans. The Project Site is located approximately 0.9 miles south of the I-215 which would be an evacuation route during emergencies; the I-215 is an evacuation route within the Valley Region of the County.¹³ In the case of potential evacuations, Little League Drive, which runs directly south of the Project Site, is also classified as a regional evacuation route. Therefore, a less than significant impact is anticipated, and no mitigation measures are required.
- g) **Less than Significant Impact with Mitigation Incorporated.** As shown in Figure S-9 Fire Hazards Areas Map of the City of San Bernardino General Plan, the Project Site is identified to be within a very high fire hazard severity zone¹⁴. The Project Site is also located within the City of San Bernardino's Foothill Fire Zone Overlay. As discussed in the City's General Plan, the Overlay district mitigates the spread of wildfires, helps minimize property damage, and reduces the risk to public health and safety. The Project Site is located south of the San Bernardino Mountains which could pose a significant risk involving wildland fires. The Applicant has submitted a Fuel Modification Plan (FMP) as required by the San Bernardino Development Code Chapter 19.15 FF, Foothill Fire Zones Overlay District for review and approval by the County Fire Marshal. The FMP includes fuel modification zones for vegetation and debris clearance and maintenance of those zones (see Appendix F). Implementation of an approved FMP will reduce impacts to the extent feasible.

¹¹ California Department of Toxic Substances Control EnviroStor Database. <https://www.envirostor.dtsc.ca.gov/public/>. Accessed July 9, 2024.

¹² San Bernardino Countywide Plan. "HZ-9: Airport Safety & Planning Areas." Accessed July 9, 2024.

¹³ San Bernardino Countywide Plan. "PP-2 Evacuation Routes". Accessed April 17, 2024.

¹⁴ City of San Bernardino General Plan. Figure S-9 "Fire Hazards Areas Map"

All other standards of the Development Code Chapter 19.15 FF as applicable to the Proposed Project shall be imposed by the City as Conditions of Approval. Adherence to the FMP and the Development Code will ensure impacts are less than significant.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
X. HYDROLOGY AND WATER QUALITY – Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede substantial groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	☐	☐	☒	☐
i) result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv) impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or substantial groundwater management plan?	☐	☐	☐	☒

Discussion:

- a) **Less than Significant Impact.** A Preliminary Hydrology Study and Drainage Analysis, dated December 2024 (see Appendix G), and a Preliminary Water Quality Management Plan dated November 22, 2024 (see Appendix H), were prepared by Joseph E. Bonadiman & Associates, Inc. Both reports are summarized herein. The Proposed Project would disturb a 15.71-acre site and would therefore be subject to the National Pollutant Discharge Elimination System (NPDES). The State of California is authorized to administer various aspects of the NPDES. Construction activities covered under the State's General Construction permit include the removal of vegetation, grading, excavating, or any other activity that causes the disturbance of one acre or more.

The General Construction permit requires recipients to reduce or eliminate non-storm water discharges into stormwater systems, and to develop and implement a SWPPP. The SWPPP is based on the principles of Best Management Practices (BMPs) to control and abate pollutants. Examples of BMPs include sandbag barriers, geotextiles, storm drain inlet protection, sediment traps, rip rap soil stabilizers, sweep roadway from track out, and rumble strips. BMPs applicable to the Proposed Project will be subject to City approval and provided in contract bid documents. The SWPPP must include BMPs to prevent project-related pollutants from impacting surface waters. The purpose of a SWPPP is to: 1) identify pollutant sources that may affect the quality of discharges of storm water associated with construction activities; and 2) identify, construct and implement storm water pollution control measures to reduce pollutants in storm water discharges from the construction site during and after construction.

The NPDES also requires a Water Quality Management Plan (WQMP), which is subject to review and approval by the City. A preliminary WQMP was prepared for the Proposed Project. The WQMP includes mandatory compliance of BMPs as well as compliance with NPDES Permit requirements. Review and approval of the WQMP by the City would ensure that all potential pollutants of concern are minimized or otherwise appropriately treated prior to being discharged from the Project Site. Less than significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

- b) **Less than Significant Impact.** The Project Site is located within the service area of the San Bernardino Municipal Water Department (SBMWD). The SBMWD water service area is approximately 45 square miles, providing water to approximately 210,000 persons in the City of San Bernardino and unincorporated areas of San Bernardino County.¹⁵ SBMWD's water supply is comprised entirely of groundwater from the Bunker Hill Basin (part of the San Bernardino Basin Area). In addition to potable water, SBMWD provides wastewater collection and treatment services and is developing a recycled water system for groundwater recharge and non-potable reuse.

As stated in the 2020 Integrated Regional Urban Water Management Plan Part 2 Chapter 8 SBMWD 2020 UWMP, during a multiple dry-year period, the SBMWD's total water supply is projected to be 58,963 acre-feet (AF) by 2045, while the total water demand is projected to be 51,272 AF in the same year, which would result in a 7,691 AF annual surplus.¹⁶ Therefore, the UWMP indicates that the SBMWD's supplies have been determined to be sufficient to meet

¹⁵ 2020 Part 1: Upper Santa Ana River Watershed. Integrated Regional Urban Water Management Plan. Page 2-11 chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.sbmwd.org/DocumentCenter/View/7863/Part-1-2020-IRUWMP---Regional-Context_FINAL?bidId=

¹⁶ 2020 Integrated Regional Urban Water Management Plan. Part 2 Chapter 8 SBMWD 2020 UWMP. Table 8-16. DWR 7-4R Multiple Dry Years Supply and Demand Comparison (AF). Accessed January 23, 2025.

demands within the department's service area during normal, dry, and multiple dry years through the year 2045.

The Proposed Project is an acceptable use within the residential land use category and with the water demand estimated for that use in planning documents, there would be no substantial decrease in groundwater supplies or effect on the SBMWD Master Plan. The Proposed Project does not include groundwater wells that would impact the production rate of any nearby pre-existing wells. The Proposed Project also includes a water detention/water quality basin that will capture storm flows on-site and allow flows to percolate into the underlying groundwater basin. No significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

c)

- i) **Less than Significant Impact.** Erosion is a phenomenon characterized by the wearing away of a geologic surface as a result of forces such as wind or water. Siltation is another geologic process that describes how fine mineral particles such as silt or clay may be suspended in a body of water in various amounts depending on water velocity.

During the temporary construction period, soil erosion could occur on site due to a storm event. Construction activities covered under the State of California's General Construction permit include removal of vegetation, grading, excavating, or any other activities that causes the disturbance of one acre or more. The General Construction permit requires recipients to reduce or eliminate non-storm water discharges into stormwater systems, and to develop and implement a Storm Water Pollution Prevention Plan (SWPPP). The purpose of the SWPPP is to: 1) identify pollutant sources that may affect the quality of discharges of stormwater associated with construction activities; and 2) identify, construct, and implement stormwater pollution control measures to reduce pollutants in stormwater discharges from the construction site during and after construction. The SWPPP must list BMPs to avoid and minimize soil erosion. Adherence to BMPs would prevent substantial soil erosion or the loss of topsoil. Examples of BMPs include, i.e., sandbag barriers, geotextiles, storm drain inlet protection, sediment traps, rip rap soil stabilizers, sweep roadway from track-out, and rumble strips. BMPs applicable to the Proposed Project will be subject to City approval and provided in contract bid documents. Therefore, less than significant impacts are identified or anticipated, and no mitigation measures are required.

- ii, iii) **Less than Significant Impact.** As noted in the WQMP, southwest of the Project Site is Cable Creek Channel, Ronald Reagan Park, and the Verdmont Heights Community. To the north is the San Bernardino National Forest, to the west is vacant land, to the east is existing residential development.

An increase in peak flow and runoff volume is expected for the Proposed Project, due to the development's additional paved surfaces. Per the San Bernardino County Hydrology Manual, developed sites shall not increase existing condition flow rate. In order to meet mitigation requirements per "San Bernardino County Detention Basin Design Criteria" post-development peak flow rates generated by the site shall be less than or equal to 90 percent of the pre-development peak flow rate based on shifting the rainfall values for the 10-year, 25-year and 100-years storms, providing a least a 50 percent confidence level that the detention basin outflow will not adversely impact downstream properties. This will be achieved with the use of on-site retention and water quality basins designed to capture, treat for water quality objectives and meter out storm water effluent at or below the existing storm water flow rates. Development of the Proposed Project would not have a negative impact on downstream properties or facilities with County detention basin criteria compliance. Two drainage areas were identified and modeled in the WQMP to determine storm flows and requirements for retention. The Proposed Project would

utilize two underground storm infiltration chambers for Drainage Area A with the capacity of 2.94 acre-feet (128,053 CF) and for Drainage Area C with the capacity of 0.50 acre-feet (21,619 CF). Any excess storm water shall be conveyed to a proposed reinforced concrete pipe that will connect to the existing 63-inch Chestnut Avenue Storm Drain within Verdemon Avenue.

The Proposed Project would have a less than significant impact on the rate or amount of surface runoff resulting in flooding on- or off-site with implementation of the above-described detention basins and connection to the existing off-site storm drain.

- iv) **Less than Significant Impact.** The Project Site is not within a 100-Year Federal Emergency Management Agency (FEMA) flood zone, 100-year Department of Water Resources Awareness Zone, or a 500-year FEMA flood zone.¹⁷ Under existing conditions, the Project Site sloped seven to nine percent. As previously stated above, the Proposed Project would utilize two underground storm infiltration chambers. Drainage A with the capacity of 2.94 acre-feet (128,053 CF) and Drainage Area C with the capacity of 0.50 acre-feet (21,619 CF) to capture storm flows; excess storm water shall be conveyed to a proposed reinforced concrete pipe that will connect to the existing 63-inch Chestnut Avenue Storm Drain within Verdemon Avenue. The existing site generally drains to the south. Development of the Proposed Project would not substantially impede or redirect flood flows. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.
- d) **No Impact.** The Project Site is located within a Zone X designation as mapped on the Federal Emergency Management Agency (FEMA) Panel No. 06071C7930J. Areas identified as Zone X are located outside of the 0.2 percent annual chance floodplain. According to the City's 100-Year Flood Plain Figure S-1: "100- Year Flood Plain" of the San Bernardino General Plan¹⁸, the Project Site is located outside of the 100-year flood zone. Therefore, implementation of the Proposed Project is not anticipated to impede or redirect flood flows within the 100-year flood zone. Furthermore, due to inland distance from the Pacific Ocean and any other significant body of water, tsunamis and seiches are not potential hazards at the site. The Project Site and vicinity is within relatively flat terrain and there are no nearby hillsides that would result in mudflows. Therefore, no impacts from seiche and tsunami are identified or anticipated, and no mitigation measures are required.
- e) **No Impact.** The Proposed Project would disturb approximately 105 acres; therefore, it is subject to the Statewide NPDES permit managed by the Regional Water Quality Control Board Requirements of the permit which would include development and implementation of a SWPPP prior to construction, which is subject to RWQCB review and approval. The SWPPP would include BMPs to control and abate pollutants and treat runoff that can be used for groundwater recharge. The Proposed Project would not otherwise substantially degrade water quality as appropriate measures relating to water quality protection would be implemented as approved by the City. California's Sustainable Groundwater Management Act (SGMA) requires State-designated medium-and high-priority basins to develop groundwater sustainability agencies (GSAs), development groundwater sustainability plans (GSPs) and manage groundwater for long-term sustainability. The SGMA 2019 Basin Prioritization identified ninety-four basins and/or sub-basins as medium or high priority and are required to form GSAs and develop GSPs. These

¹⁷ Federal Emergency Management Agency (FEMA) Flood Map Service. <https://www.fema.gov/flood-maps>.

¹⁸ City of San Bernardino General Plan, Figure S-1: "100- Year Flood Plain"
<http://www.sbcity.org/civicax/filebank/blobdload.aspx?blobid=26199>. Page 10-13

94 basins, in combination with adjudicated areas which have existing governance and oversight in place, account for over 98 percent of the pumping (20 million acre-feet), 83 percent of the population (25 million Californians), and 88 percent of all irrigated acres (6.7 million acres) within the state's groundwater basins.¹⁹ The Project Site overlies the Upper Santa Ana Valley-San Bernardino (8-002.06) which is not a basin required to develop a residential area.

Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
XI. LAND USE AND PLANNING – Would the project:				
a) Physically divide an established community?	☐	☐	☒	☐
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

Discussion:

- a) **Less than Significant Impact.** The physical division of an established community is typically associated with construction of a linear feature, such as a major highway or railroad tracks, or removal of a means of access, such as a local road or bridge, which would impair mobility in an existing community or between a community and an outlying area. The Proposed Project does not include the construction of a linear feature. The Proposed Project would be a consistent use with the surrounding residential developments to the south. Therefore, the Proposed Project would neither physically divide an established community nor cause a significant environmental impact due to conflict with any land use plans or policies. Less than significant impacts would occur, and no mitigation measures are required.
- b) **Less than Significant Impact.** The Proposed Project is designed to be consistent with all City development standards that are intended to promote and protect the public health, safety, peace, comfort and general welfare including providing sufficient parking on-site, meeting the minimum lot size for the development type, meeting the lot coverage by structure and structure height, and providing sufficient setbacks from the frontage, rear, and sides to provide appropriate distance from adjacent land uses. The Proposed Project would not result in any environmental impact due to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating environmental effect, as demonstrated throughout this Initial Study.

Provided below is a consistency review of the Proposed Project's relation to the City of San Bernardino General Plan policies and goals that have been adopted for the purpose of avoiding or

¹⁹ <https://water.ca.gov/Programs/Groundwater-Management/Basin-Prioritization>

mitigating any environmental effects of project development. Therefore, less than impacts are identified or anticipated, and no mitigation measures are required.

General Plan Policies and Goals	Proposed Project Consistency
Policy 2.1.2: Require that new development with potentially adverse impacts on existing neighborhoods or residents such as noise, traffic, emissions, and storm water runoff, be located and designed so that quality of life and safety in existing neighborhoods are preserved.	The Proposed Project is consistent with this policy. The Proposed Project has been designed to comply with the applicable standards provided in the City’s General Plan, CBC Guidelines, and City’s Municipal Code and Development Code standards to minimize any potentially adverse impacts on existing neighborhoods or residents.
Policy 2.2.1: Ensure compatibility between uses and quality design through adherence to the standards and regulations in the Development Code and policies and guidelines in the Community Design Element.	The Proposed Project is consistent with this policy. As documented in Section I and in the Project Description, the Proposed Project would include placement of lighting fixtures consistent with City standards and subject to City approval of a lighting plan. The Proposed Project includes decorative perimeter fencing/walls, landscaping and required on-site and off-site improvements to provide consistency within the Residential Low (RL) zoning district.
Policy 2.2.2: Require new uses to provide mitigation or buffers between existing uses where potential adverse impacts could occur, including, as appropriate, decorative walls, landscape setbacks, restricted vehicular access, enclosure of parking structure to prevent sound transmission, and control of lighting and ambient illumination.	The Proposed Project is consistent with this policy. The Proposed Project would have 10 feet setbacks in areas adjacent to residential development. Additionally, a six-foot-high concentrate perimeter wall shall be constructed along the property line of homes adjacent to Verdemon Drive. The lighting would be designed in compliance with City Development Code 19.20.030 which requires that lighting should be stationary and deflected away from all adjacent properties and public streets and rights-of-way. Therefore, with the incorporation of setbacks, perimeter walls, landscaping, and lighting design the projects operational noise would not exceed the residential standards set forth in Section 19.20.030.15(A) of the City’s Municipal Code and would not result in substantial increases in ambient noise levels at nearby and adjacent residences.
Policy 2.5.4: Require that all new structures achieve a high level of architectural design and provide careful attention to detail.	The Proposed Project is consistent with this policy. The Proposed Project would be required to maintain an aesthetic design that would be intended to promote the existing site’s aesthetic character and be consistent with the surrounding neighborhood. The design of future homes would be subject to City review and approval.

Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
XII. MINERAL RESOURCES – Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

Discussion:

- a-b) **No Impact.** According to the City of San Bernardino General Plan, Mineral Resource Zones Figure NRC-3 does not identify the Project Site within an Aggregate Resource Zone²⁰. Additionally, the size of the Project Site and surrounding residential land uses would make the site unsuitable for mineral resources extraction. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
XIII. NOISE – Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☒	☐	☐
c) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

²⁰ The City of San Bernardino General Plan. Figure NRC-3.

Discussion:

- a) **Less than Significant Impact.** A Noise Impact Analysis dated November 8, 2024, was completed for the Proposed Project by Ganddini Group Inc and is summarized herein (see Appendix I). Noise can be measured in the form of a decibel (dB), which is a unit for describing the amplitude of sound. The predominant rating scales for noise in the State of California are the Equivalent-Continuous Sound Level (L_{eq}), and the Community Noise Equivalent Level (CNEL), which are both based on the A-weighted decibel (dBA). The L_{eq} is defined as the total sound energy of time-varying noise over a sample period. The CNEL is defined as time-varying noise over a 24-hour period with a weighted factor of 5 dBA applied to the hourly L_{eq} for noise occurring from 7:00 p.m. to 10:00 p.m. (defined as relaxation hours) and 10 dBA applied to events occurring between (10:00 p.m. and 7:00 a.m. defined as sleeping hours). The State of California's Office of Noise Control has established standards and guidelines for acceptable community noise levels based on the CNEL and L_{dn} rating scales. The purpose of these standards and guidelines is to provide a framework for setting local standards for human exposure to noise.

San Bernardino is affected by several different sources of noise, including automobile, rail and air traffic, sports events, commercial and industrial activity, and periodic nuisances such as construction. Excessive levels of noise can damage human physical health, psychological stability, social cohesion, property values, and economic productivity. The control of noise, therefore, is an essential component in creating a safe, compatible, and productive environment.

Project Construction

On-Site Equipment

Construction noise is regulated within Section 8.54.070 of the City of San Bernardino's Municipal Code which prohibits construction activities other than between the hours of 7:00 AM to 8:00 PM. However, neither the City of San Bernardino General Plan or Municipal Code establish numeric maximum acceptable construction source noise levels at potentially affected receivers, which would allow for a quantified determination of what CEQA consists as a substantial temporary or periodic noise increase. Therefore, a numerical construction noise threshold based on the Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment Manual is used for analysis of daytime construction impacts, as discussed below.

According to the FTA, local noise ordinances are typically not very useful in evaluating construction noise. They usually relate to nuisance and hours of allowed activity, and sometimes specify limits in terms of maximum levels, but are generally not practical for assessing the impact of a construction project. Project construction noise criteria should account for the existing noise environment, the absolute noise levels during construction activities, the duration of the construction, and the adjacent land use. Due to the lack of standardized construction noise thresholds, the FTA provides guidelines that can be considered reasonable criteria for construction noise assessment. The FTA considers a daytime exterior construction noise level of 80 dBA L_{eq} as a reasonable threshold for noise sensitive residential land use.

Accordingly, the project would result in a significant impact if:

- Project construction occurs outside the hours of 7:00 AM and 8:00 PM or,

- Project construction noise exceeds 80 dBA Leq at residential use.

Project construction noise levels at nearby sensitive receptors were calculated using the FTA methodology. Construction noise modeling worksheets for each phase are provided within the Noise Study. The single-family residential uses to the south of the Project Site boundaries may be affected by short-term noise impacts associated with construction noise. Construction noise will vary depending on the construction process, type of equipment involved, location of the construction site with respect to sensitive receptors, the schedule proposed to carry out each task (e.g., hours and days of the week) and the duration of the construction work. Assumptions for the phasing, duration, and required equipment for the construction of the Proposed Project were obtained from the project applicant.

The modeled construction noise levels are forecast to reach up to 67.1 dBA Leq at the nearest residential property line to the south of the Project Site. Noise measurement (NM)1 was chosen to represent noise levels at this nearest property line.

Project construction will not occur outside of the hours outlined as “exempt” in City of San Bernardino’s Municipal Code Section 8.54.070. The estimated 67.1 dBA Leq at the nearest residential use will not exceed the FTA residential construction noise standard of 80 dBA Leq. Therefore, the project would not exceed established standards relating to construction noise. The project impact is less than significant; no mitigation is required.

Notwithstanding the above, best management practices (BMPs) provided in the Project Description should be added to project plans and in contract specifications to minimize construction noise emanating from the Proposed Project. The following best management practices (BMPs) shall be provided on project plans and in contract specifications to minimize construction noise emanating from the Proposed Project:

1. All equipment, whether fixed or mobile, will be equipped with properly operating and maintained mufflers, consistent with manufacturer standards.
2. All stationary construction equipment will be placed so that emitted noise is directed away from the noise sensitive receptors nearest the Project Site.
3. As applicable, all equipment shall be shut off and not left to idle when not in use.
4. To the degree possible, equipment staging will be located in areas that create the greatest distance between construction-related noise and vibration sources and existing sensitive receptors.
5. Jackhammers, pneumatic equipment, and all other portable stationary noise sources will be directed away and shielded from existing residences in the vicinity of the project site. Either one-inch plywood or sound blankets can be utilized for this purpose. They should reach up from the ground and block the line of sight between equipment and existing residences. The shielding should be without holes and cracks.
6. No amplified music and/or voice will be allowed on the project site during construction.
7. Haul truck deliveries will not occur outside of the hours presented as exempt for construction per Section 8.54.070 of the City of San Bernardino’s Municipal Code.

Off-Site Vehicle Trips:

Construction truck trips would occur throughout the construction period. According to the FHWA, the traffic volumes need to be doubled in order to increase noise levels by 3 dBA CNEL.¹ The estimated existing average daily trips along Magnolia Avenue is between 600 to 1,400 daily vehicle trips.² The greatest number of construction-related vehicle trips per day were estimated to be up to 54 vehicle trips per day during building construction (41.4 for worker trips and 12.3 for vendor trips). Given the Project Site's location, it is anticipated that vendor and/or haul truck traffic would take the most direct route to the 215 Freeway. Therefore, the addition of project vendor/haul trucks and worker vehicles per day along off-site roadway segments would not be anticipated to result in a doubling of traffic volumes. Off-site project generated construction vehicle trips would result in a negligible noise level increase and would not result in a substantial increase in ambient noise levels. Impacts would be less than significant. No mitigation measures are required.

Project Operational Noise

Future Roadway Noise to the Project

Verdemont Drive borders the Project Site to the south. As stated in the TIA prepared for the Proposed Project, Verdemont Drive east of Magnolia Avenue is currently designated as a Collector (60 feet ROW and 40 feet roadway) on the City of San Bernardino General Plan Circulation Element. Future traffic noise levels were modeled at the proposed residential lots using the SoundPLAN noise model. The Project Site future traffic noise levels would not exceed 65 dBA CNEL at the proposed residential lots. Future traffic impacts to the Proposed Project associated with Verdemont Drive will be less than significant; no mitigation is required.

Offsite Operational Noise Sources

California courts have rejected use of what is effectively a single "absolute noise level" threshold of significance (e.g., exceed 65 dBA CNEL) on the grounds that the use of such a threshold fails to consider the magnitude or severity of increases in noise levels attributable to the project in different environments (see *King and Gardiner Farms, LLC v. County of Kern* (2020) 45 Cal.App.5th 814). California courts have also upheld the use of "ambient plus increment" thresholds for assessing project noise impacts as consistent with CEQA, noting however, that the severity of existing noise levels should not be ignored by incorporating a smaller incremental threshold for areas where existing ambient noise levels were already high (see *Mission Bay Alliance v. Office of Community Investment and Infrastructure* (2016) 6 Cal.App.5th 160).

The City of San Bernardino has adopted a Land Use Compatibility Guidelines. The City of San Bernardino General Plan identifies exterior noise levels up to 60 dBA CNEL as normally acceptable and up to 70 dBA as conditionally acceptable for single-family residential uses. The City also identifies noise standards for single-family residential uses of 65 dBA CNEL exterior and 45 dBA CNEL interior. Facades with anticipated noise levels of 65 dBA CNEL are expected to have interior noise levels that do not exceed 45 dBA CNEL. This is based on the assumption that heating and ventilation systems will be provided in order to allow for a windows-closed condition.

Based on the case described above, it is important to consider impacts in light of the existing ambient noise level and the adopted agency standards, which in this case includes the Land Use Compatibility Guidelines. Furthermore, it is widely accepted that the average healthy human ear

can barely perceive changes of 3 dBA in an outdoor environment and that a change of 5 dBA is readily perceptible. Accordingly, the project's offsite roadway noise impacts shall be considered significant if any of the following occur as a direct result of the proposed development:

- Noise levels are expected to exceed the City's applicable "normally acceptable" noise level criteria found in their Land Use Compatibility Guidelines shown in within the noise study, (e.g., 60 dBA CNEL for residential uses) and:
 - The project creates a 5 dBA CNEL or greater increase where pre-project ambient noise levels are 60 dBA CNEL or less; or,
 - The project creates a 3 dBA CNEL or greater increase where pre-project ambient noise levels exceed 60 dBA CNEL.

Roadway noise levels were calculated for land uses adjacent to roadways in the project vicinity based on the FHWA Traffic Noise Prediction Model methodology. During operation, the Proposed Project is expected to generate a total of approximately 1,084 daily trips, including 81 trips during the AM peak hour and 108 trips during the PM peak hour. Roadway noise levels were calculated for the following scenarios:

- Existing (without Project): This scenario refers to existing year traffic noise conditions.
- Existing Plus Project: This scenario refers to existing year plus project traffic noise conditions.

The modeled existing traffic noise levels range between 37-77 dBA CNEL and the modeled Existing Plus Project traffic noise levels range between 53-77 dBA CNEL at the right-of-way of each study roadway segment.

The majority of the modeled roadway segments are below the lowest threshold of a 3 dB increase. Those segments that are above the lowest increase threshold are discussed below.

Verdemont Drive from Little League Drive to Antique Street has an existing noise level of 48.8 dBA CNEL; therefore, the appropriate increase threshold for this roadway segment is 5 dB. The increase along Verdemont Drive from Little League Drive to Antique Street is 5.42 dB, which is slightly above the 5 dB threshold. However, the modeled existing plus project noise levels would not cause ambient noise levels to exceed what is considered to be "normally acceptable" for residential land uses (60 dBA CNEL or less) at the affected residential land uses along Verdemont Drive.

Verdemont Drive East of Antique Street has an existing noise level of 48.8 dBA CNEL; therefore, the appropriate increase threshold for this roadway segment is 5 dB. The increase along Verdemont Drive East of Antique Street is 6.42 dB, which is above the 5 dB threshold. However, the modeled existing plus project noise levels would not cause ambient noise levels to exceed what is considered to be "normally acceptable" for residential land uses (60 dBA CNEL or less) at the affected residential land uses along Verdemont Drive.

Ohio Avenue west of Magnolia Avenue has an existing noise level of 52.34 dBA CNEL; therefore, the appropriate increase threshold for this roadway segment is 5 dB. The increase along Ohio Avenue west of Magnolia Avenue is 4.91 dB, which is below the 5 dB threshold.

Little League Drive from Verdemont Drive to Meyers Road has an existing noise level of 56.12 dBA CNEL; therefore, the appropriate increase threshold for this roadway segment is 5 dB. The increase along Little League Drive from Verdemont Drive to Meyers Road is 3.22 dB, which is below the 5 dB threshold.

Antique Street from Verdemont Drive to Ohio Avenue has an existing noise level of 48.78 dBA CNEL; therefore, the appropriate increase threshold for this roadway segment is 5 dB. The increase along Antique Street from Verdemont Drive to Ohio Avenue is 7.34 dB, which is above the 5 dB threshold. However, the modeled existing plus project noise levels would not cause ambient noise levels to exceed what is considered to be “normally acceptable” for residential land uses (60 dBA CNEL or less) at the affected residential land uses along Antique Street.

Magnolia Avenue from Ohio Avenue to Meyers Avenue has an existing noise level of 54.1 dBA CNEL; therefore, the appropriate increase threshold for this roadway segment is 5 dB. The increase along Magnolia Avenue from Ohio Avenue to Meyers Avenue is 3.19 dB, which is below the 5 dB threshold.

Therefore, the addition of project trips is not expected to change noise levels in excess of the applicable thresholds at the study roadway segments. The project impact is less than significant; no mitigation is required.

- b) **Less than Significant with Mitigation Incorporated.** In relation to the Environmental Checklist noise issue “b”, the City of San Bernardino has not established thresholds of significance concerning groundborne vibration. In the absence of City-established thresholds, groundborne vibration impacts are based on guidance from the Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment Manual (FTA, September 2018) (see Regulatory Setting section). Accordingly, the project would result in a significant impact if:

- Groundborne vibration levels generated by the project have the potential to cause architectural damage at nearby buildings by exceeding the following PPV:
 - 0.10 in/sec at buildings extremely susceptible to vibration damage
 - 0.20 in/sec at non-engineered timber and masonry buildings
 - 0.30 in/sec at engineered concrete and masonry (no plaster) buildings
 - 0.50 in/sec at reinforced-concrete, steel or timber (no plaster) buildings
- Groundborne vibration levels generated by the project have the potential to cause annoyance at sensitive receptors by exceeding 72 VdB (0.006 PPV in/sec).

Construction-Related Vibration Impacts

Estimated groundborne vibration levels at the nearest sensitive receptors are presented within the Noise Study. The closest existing structures to the Project Site are the residential structures located as close as approximately 12 feet from the southern project property line (taking into account that the project is to develop Verdemont Road). At 12 feet, the use of a vibratory roller would be expected to generate a PPV of 0.631 in/sec and a bulldozer would be expected to generate a PPV of 0.268 in/sec. Therefore, project construction activities would exceed the threshold of architectural damage to residential structures of 0.2 PPV in/sec. Prohibiting vibratory rollers within 26 feet and large bulldozers within 15 feet of residential structures to the south of the Project Site

would reduce architectural damage impacts from project construction to less than the 0.2 PPV in/sec threshold. With implementation of Mitigation Measure NOI-1, groundborne vibration generated by project construction would not exceed the levels necessary to cause architectural damage; therefore, the project impact would be less than significant.

Rollers used within 12 feet of the residential land uses located at the south of the Project Site, resulting in a VdB of 100, which exceeds the FTA's annoyance standard for construction vibration. However, construction of the Verdumont Drive, which would include use of a roller would be short-term and therefore, the impact would be less than significant. The use of large bulldozers at the southern end of the Project Site would result in VdB levels reaching up to 97, which would also exceed the FTA's annoyance standard for construction vibration. The grading phase of construction may include the use of a large bulldozer at the southern portion of the Project Site; however, the use of a large bulldozer would be short-term and therefore, the Rollers used within 12 feet of the residential land uses located at the south of the Project Site, resulting in a VdB of 100, which exceeds the FTA's annoyance standard for construction vibration. However, construction of the Verdumont Drive, which would include use of a roller would be short-term and therefore, the impact would be less than significant. The use of large bulldozers at the southern end of the Project Site would result in VdB levels reaching up to 97, which would also exceed the FTA's annoyance standard for construction vibration. The grading phase of construction may include the use of a large bulldozer at the southern portion of the Project Site; however, the use of a large bulldozer would be short-term and therefore, the impact related to annoyance would be less than significant.

Mitigation Measure NOI-1:

The use of vibratory rollers, or other similar vibratory equipment, shall be prohibited within 26 feet and large bulldozers within 15 feet of residential structures to the south of the Project Site. Construction activity that must occur within these distances would need to be performed with smaller equipment types that do not exceed the vibratory threshold identified herein. Construction activity is also limited by the City of San Bernardino's Municipal Code which limits construction activities to occur only between the hours of 7:00 AM and 8:00 PM.

With implementation of Mitigation Measure NOI-1, impacts related to vibration would be less than significant.

- c) **No Impact.** The closest airport to the Project Site is the San Bernardino International Airport (SBIA), which is located approximately 10.06 miles to the southeast of the Project Site. The City of San Bernardino General Plan states that, during the writing of the General Plan, the Airport Master Plan and the Comprehensive Land Use Plan (CLUP) for SBIA were in the process of being prepared and the Airport was operating under an Interim Airport Operating Plan. Therefore, the precise noise contours and safety zones were not available for inclusion in the City's General Plan. However, per the noise contour maps provided in the Federal Aviation Administration's (FAA) Finding of No Significant Impact (FONSI) and Record of Decision (ROD) for the proposed Eastgate Air Cargo Facility at San Bernardino International Airport (December 2019), the Proposed Project Site is well outside the 65 dBA CNEL noise contours of the San Bernardino International Airport. Therefore, as the project is not within two miles of a public airport or in the vicinity of a private airstrip, the project would not expose people residing or working in the project area to excessive noise levels associated with airports.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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XIV. POPULATION AND HOUSING – Would the project:

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? | ☐ | ☐ | ☒ | ☐ |
| b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? | ☐ | ☐ | ☒ | ☐ |

Discussion:

- a) **Less than Significant Impact.** Construction activities at the Project Site would be short-term and would not attract new employees to the area. The Proposed Project includes the development of 105 single-family dwelling units. According to the City of San Bernardino General Plan Verdemon Heights Area Plan, the average persons per household is 3.34 countywide.²¹ The proposed development of 105 single-family dwelling units would therefore result in an estimated population of 350 residents. Thus, the Proposed Project would account for an approximately 2 percent of the projected 10-year growth in the City of San Bernardino. The Proposed Project would be of allowable use within the Residential Low Zoning District. Therefore, population growth from the Proposed Project was anticipated for the buildout of the Planning Area. Less than significant adverse impacts are identified or anticipated, and no mitigation measures are required.
- b) **Less than Significant Impact.** The Proposed Project would not displace any people, or necessitate the construction of replacement housing elsewhere, because the Project would not displace any currently occupied housing. Therefore, less than significant adverse impacts are identified or anticipated, and no mitigation measures are required.

²¹ City of San Bernardino General Plan. Verdemon Heights Area Plan. Page 2-76.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
XV. PUBLIC SERVICES				
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	☐	☐	☒	☐
Fire protection?	☐	☐	☒	☐
Police protection?	☐	☐	☒	☐
Schools?	☐	☐	☒	☐
Parks?	☐	☐	☒	☐
Other Public Facilities?	☐	☐	☒	☐

Discussion:

a) Fire Protection:

Less than Significant Impact. According to the General Plan, fire prevention, fire protection, and emergency medical service in the planning area within the San Bernardino City limits are provided by the San Bernardino County Fire Department.²² There are two fire stations located within close proximity of the Project Site. Fire Station 232, located at 6065 Palm Avenue, San Bernardino, approximately 1.2 miles southwest of the Project Site, and Devore Fire Station, located at 18365 Cajon Boulevard, approximately 2.3 miles northwest of the Project Site. There are twelve fire stations in San Bernardino and the City has mutual joint response agreements with the cities of Loma Linda, Colton, Rialto, and Central Valley Fire District (Station #75, in Muscoy), and the U.S. Forest Service. The Site Plan would be reviewed by the County Fire Marshal prior to the issuance of development permits. Developer impact fees are collected at the time of building permit issuance to provide funding for necessary service increases associated with planned growth and development. Therefore, less than significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Police Protection:

Less than Significant Impact. Police services are provided by the City Police Department within the City limits. The planning area is served by a main police station and six community service

²² City of San Bernardino General Plan <http://www.sbcity.org/civicax/filebank/blobdload.aspx?blobid=26199>. Page 7-6

offices that serve five designated geographical patrol districts.²³ All emergency calls and requests for service from the Project Site would be dispatched from the main police station at 710 North D Street, which is located approximately 8 miles south from the Project Site. The City Police Department would review the Site Plan prior to the issuance of development permits. Developer impact fees are collected at the time of building permit issuance to offset project impacts as well as to provide funding for necessary service increases associated with planned growth and development. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Schools:

Less than Significant Impact. The Project Site is located within San Bernardino City Unified School District (SBCUSD). Construction and operation of new school facilities are funded through school impact fees assessed on new developments that occur within the school district. The future development of 105 single-family residences would result in an additional 380 people.²⁴

The San Bernardino City Unified School District's 2024 School Facility Fee Justification Report identified the student-per-home ratio to be 0.631.²⁵ Therefore, the Proposed Project would be anticipated to generate approximately 73 students. The District enrollment for the 2023/2024 school year totaled 50,434 students. The Proposed Project would result in a 0.17 percent increase in students enrolled in the school district. The Proposed Project would be required to pay fees of \$5.17 per square foot for residential development. At an average home size of 1,600 square feet, this would result in \$1.1 million in school district revenue.

Through the implementation of all regulations and City and School District policies for development projects, the Proposed Project would have a less than significant impact on schools. Therefore, less than significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Parks:

The City of San Bernardino has a total of 539.98 acres dedicated to parks and recreation, which include 52 developed parks & facilities.²⁶ There are nineteen neighborhood, ten community, seventeen mini, three regional parks and three special facilities. Additionally, many school sites, community centers and senior centers throughout the City are available for recreational activities. The City utilizes a park acreage standard of five acres per 1,000 residents.

The projected population for the City of San Bernardino in the year 2030 is projected to be approximately 226,487 people.²⁷ Using either the City's parkland requirement or the National Recreation and Parks Association (NRPA) standards, the City would experience a shortfall regardless of the required parkland at buildout if no additional parks are provided. The General Plan accounted for an additional 1,368 acres of parklands based on the NRPA standards or 1,048 acres based on the City's parkland requirements. Additional parklands are to be incorporated over time based on potential parks that may be acquired by the City or provided by new

²³ City of San Bernardino General Plan <http://www.sbcity.org/civicax/filebank/blobdload.aspx?blobid=26199>. Page 7-4

²⁴ San Bernardino Countywide Plan Draft EIR. Population and Housing. June 2019. Accessed April 17, 2024.

²⁵ School Facility Consultants. School Facility Fee Justification Report for Residential, Commercial & Industrial Development Projects for the San Bernardino City Unified School District.

²⁶ City of San Bernardino General Plan <http://www.sbcity.org/civicax/filebank/blobdload.aspx?blobid=26199>. Page 8-5

²⁷ City of San Bernardino General Plan. Population Profile. January 2024. Accessed April 17, 2024.

subdivisions. Additionally, the presence of the local San Bernardino National Forest gives surrounding residents year-round passive and active recreation opportunities. Increased property and sales tax associated with the direct and indirect improvement of the property would provide funding for necessary service increases associated with growth and development. Therefore, less than significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Other Public Facilities:

Less than Significant Impact. The Proposed Project is not expected to have a significant impact on public facilities/services, such as libraries, community recreation centers, and/or animal shelters. The Proposed Project would result in an additional 105 homes in the City upon buildout. Property taxes from the new residences would increase the City General Fund and assist in funding these public services. Therefore, the implementation of the Proposed Project would not significantly affect other public facilities or require the construction of new or modified facilities. Less than significant adverse impacts are identified or anticipated, and no mitigation measures are required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
XVI. RECREATION				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐

Discussion:

- a) **Less than Significant Impact.** The City of San Bernardino has a total of 539.98 acres dedicated to parks and recreation, which include 52 developed parks & facilities.²⁸ There are nineteen neighborhood, ten community, seventeen mini, three regional parks and three special facilities. Additionally, many school sites, community centers and senior centers throughout the City are available for recreational activities. The City utilizes a park acreage standard of five acres per 1,000 residents²⁹.

²⁸ City of San Bernardino General Plan <http://www.sbcity.org/civicax/filebank/blobdload.aspx?blobid=26199>. Page 8-5

²⁹ City of San Bernardino General Plan. Park Standards. Page 8-3. Accessed April 17, 2024,

The projected population for the City of San Bernardino's in 2030 is approximately 226,487 people.³⁰ Using either the City's parkland requirement or the National Recreation and Parks Association (NRPA) standards, the City will experience a shortfall in required parkland at buildout if no additional parks are provided. The General Plan accounted for an additional 1,368 acres of parklands based on the NRPA standards or 1,048 acres based on the City's parkland requirements. Additional parklands are to be incorporated overtime based on potential parks that may be acquired by the City or provided by new subdivisions. Additionally, the presence of the local San Bernardino National Forest gives surrounding residents year-round passive and active recreation opportunities.

The Proposed Project would incorporate an additional 350 people, which would not exceed the City's 2030 General Plan Update for net population growth. Therefore, the Project will have a less than significant impact on recreational facilities, and no mitigation measures are required.

- b) **Less than Significant Impact.** The Proposed Project does not include any parks, open space, or recreational facilities to serve the development or the community. Adherence to the San Bernardino General Plan and the San Bernardino Countywide Goals and Policies of the Open Space, Parks, and Recreation in the Countywide Policy Plan would ensure impacts to parks and other recreational facilities are less than significant and no mitigation measures are required.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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XVII. TRANSPORTATION/TRAFFIC – Would the project:

a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle lanes and pedestrian facilities?	☐	☐	☒	☐
b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3 Subdivision (b)(1)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d) Result in inadequate emergency access?	☐	☐	☒	☐

Discussion:

- a) **Less than Significant Impact.** A Vehicle Miles Traveled Analysis dated October 3, 2024, was prepared for the Proposed Project by Ganddini Group, Inc (Appendix J). The results of the Traffic

³⁰ San Bernardino, CA population forecast for 2025 and 2030-Aterio. Accessed January 6, 2025.

Impact Analysis are summarized herein. The existing circulation system in the area that would potentially be affected by the Proposed Project is described below.

Existing Roadway System: The lane geometry and intersection traffic controls for existing conditions based on a field survey of the study area. Regional access to the project site is provided by Interstate 215 approximately 1.0 miles to the south of the project site. Local north-south circulation is provided by Little League Drive, Magnolia Avenue and Palm Avenue; and east-west circulation is provided by Verdemont Drive, Ohio Avenue, Meyer Road, Belmont Avenue, Little League Frontage Road and Kendall Drive.

Little League Drive: This two-lane undivided roadway trends in a north-south direction and is classified as a Secondary Arterial (88-foot right-of-way and 64-foot pavement width) south of Ohio Avenue on the City of San Bernardino circulation system. On-street parking appears to be permitted in the project vicinity; except for no parking areas designated by red curb. There are no designated bicycle facilities in the project vicinity. Sidewalks are provided on the east side of the roadway in the project vicinity. The posted speed in the project vicinity is 25 miles per hour.

Magnolia Avenue: This two-lane undivided roadway trends in a north-south direction and is classified as a Collector (60-foot right-of-way and 40-foot pavement width) on the City of San Bernardino General Plan Circulation Element in the project. On-street parking is permitted in the study area. There are no designated bicycle facilities in the project vicinity. Sidewalks are provided on the east side of the roadway in the project vicinity. The posted speed in the project vicinity is 25 miles per hour.

Palm Avenue: This two-lane undivided to four-lane undivided roadway trends in a north-south direction and is classified as a Secondary Arterial (88-foot right-of-way and 64-foot pavement width) south of Ohio Avenue and as a Collector north of Ohio Avenue on the City of San Bernardino General Plan Circulation Element in the study area. On-street parking is restricted south of Belmont Avenue. Currently, there are no designated bicycle facilities in the project vicinity; however, a Class II bike lane (marked on-street lane) is proposed on the City's Bicycle Network plan. Sidewalks are provided on both sides of the roadway. The posted speed is 45 miles per hour south of Belmont Avenue and 25 miles per hour north of Belmont Avenue.

Verdemont Drive: This two-lane undivided roadway trends in an east-west direction and unclassified west of Magnolia Avenue and is classified as a Collector (60-foot right-of-way and 40-foot pavement width) on the City of San Bernardino General Plan Circulation Element east of Magnolia Avenue. On-street parking is not restricted to the study area. There are no designated bicycle facilities in the project vicinity. Currently, there is a sidewalk on the developed south side of the roadway. The speed limit is not posted speed in the project vicinity.

Ohio Avenue: This two-lane undivided roadway trends in an east-west direction and is classified as a Collector (60-foot right-of-way and 40-foot pavement width) on the City of San Bernardino General Plan Circulation Element. On-street parking is not restricted in the study area. There are no designated bicycle facilities in the project vicinity. There are sidewalks on both sides of the roadway. The speed limit is not posted speed in the project vicinity.

Meyer Road: This two-lane undivided roadway trends in an east-west direction and is unclassified on the City of San Bernardino General Plan Circulation Element. On-street parking is permitted east of Little League Drive and is restricted west of Little League Drive in the project vicinity. There are no designated bicycle facilities in the project vicinity. Sidewalks are provided on both

sides of the roadway east of Little League Drive and not provided west of Little League Drive in the project vicinity. The speed limit is not posted speed in the project vicinity.

Belmont Avenue: This two-lane undivided roadway trends in an east-west direction and is classified as a Collector (60-foot right-of-way and 40-foot pavement width) on the City of San Bernardino General Plan Circulation Element in the project vicinity. On-street parking is not restricted in the study area. Currently, there are no designated bicycle facilities in the project vicinity; however, a Class II bike lane (marked on-street lane) is proposed on the City's Bicycle Network plan. Sidewalks are provided on both sides of the roadway west of Little League Drive. The posted speed in the project vicinity is 25 miles per hour.

Little League Frontage Road: This two-lane undivided roadway trends in an east-west direction and is unclassified west of Palm Avenue and is classified as a Major Arterial (100-foot right-of-way and 72-foot pavement width) east of Palm Avenue on the City of San Bernardino General Plan Circulation Element. On street parking is not permitted based on the roadway width. Sidewalks are currently only provided adjacent to new development in the project vicinity. There are no designated bicycle facilities in the project vicinity. The speed limit is not posted speed in the project vicinity.

Pedestrian Facilities:

Sidewalks are currently not provided along the Project Site frontage. As a part of the Proposed Project, sidewalks along Little League Drive would be constructed.

Transit Facilities:

Public transportation in the City of San Bernardino area is provided by Omnitrans. Omnitrans operates 21 local-fixed routes, 14 of which serve the San Bernardino Planning Area. General service hours are between 6:00 a.m. and 8:00 p.m., Monday through Saturday. Bus Route sbX Green Line is operated by Omnitrans and travels a 15.7-mile route along the E Street Corridor, from California State University, San Bernardino at the north to Loma Linda University & Medical Center at the south. The closest bus stop is located approximately 1.5 miles away from the Project Site along Kendall Drive³¹.

Bicycle Facilities Master Plan:

According to the City of San Bernardino Bicycle Master Plan, it shows that there are proposed bicycle lanes along Palm Avenue.

Designated Truck Routes:

The City of San Bernardino Truck Routes shows that there are routes along Palm Avenue south of Little League Frontage Road.

The Proposed Project would not impede the implementation of City programs supporting walking, bicycling, and use of buses. As stated for the roadway segments for Verdemon Drive, the project is responsible for constructing half-width of roadway per City standards which should include a two-lane undivided Collector roadway for the bike lane though not the striping for this small

³¹ <https://omnitrans.org/routes/sbx-green-line/>

roadway segment. Therefore, the Proposed Project would not conflict with any adopted transportation policies, no impact associated with this issue would occur and no mitigation measures are required.

- b) **Less than Significant Impact.** California Senate Bill 743 directed the State Office of Planning and Research to amend the State CEQA Guidelines for evaluating transportation impacts to provide alternatives to Level of Service (i.e., vehicle delay) that “promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses.” In December 2018, the California Natural Resources Agency certified and adopted the updated State CEQA Guidelines package. The amended State CEQA Guidelines, specifically Section 15064.3, recommend the use of Vehicle Miles Travelled (VMT) as the primary metric for the evaluation of transportation impacts associated with land use and transportation projects. In general terms, VMT quantifies the amount and distance of automobile travel attributable to a project or region. All agencies and projects State-wide are required to utilize the updated CEQA guidelines recommending use of VMT for evaluating transportation impacts as of July 1, 2020.

The updated State CEQA Guidelines allow for lead agency discretion in establishing methodologies and thresholds provided there is substantial evidence to demonstrate that the established procedures promote the intended goals of the legislation. Where quantitative models or methods are unavailable, Section 15064.3 allows agencies to assess VMT qualitatively using factors such as availability of transit and proximity to other destinations. The Office of Planning and Research Technical Advisory on Evaluating Transportation impacts in CEQA (State of California, December 2018) provides technical considerations regarding methodologies and thresholds with a focus on office, residential, and retail developments as these projects tend to have the greatest influence on VMT.

The baseline project-generated VMT per service population is estimated to equal 18.4 VMT per service population, which is less than the City-established threshold for 32.2 VMT per service population. Therefore, the baseline project-generated VMT impact is less than significant based on the City established thresholds; no mitigation is required. The Proposed Project satisfies the City-established VMT screening criteria for projects located within a low VMT area. Therefore, preparation of a transportation impact study with vehicle miles traveled (VMT) analysis is not warranted and the proposed may be presumed to result in a less than significant VMT impact.

The Proposed Project is forecast to generate a total of approximately 1,084 daily trips, including 81 new trips during the AM peak hour and 108 new trips during the PM peak hour. Since the Proposed Project is consistent with the Southern California Association of Governments Metropolitan Planning Organization (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), the cumulative project-generated VMT impact and the project’s effect on cumulative link-level boundary VMT is less than significant based on the City-established thresholds. As such, the Proposed Project would not conflict or be inconsistent with the CEQA Guidelines Section 15064.3, subdivision (b). The potential impact of the Project would be less than significant and no mitigation measures are required.

- c) **Less than Significant Impact.** This section evaluates Project Site access and on-site circulation. Vehicular access to the Project Site is proposed to be provided by three (3) full access driveways. One Project driveway on Antique Street, the second on Project Street “A” and the third on Project Street “G”.

Project Design Features:

This analysis assumes the following improvements will be constructed by the project to provide project site access:

Roadway Segments:

Verdemont Drive

- Construct ultimate half-section width (two-lane undivided Collector roadway), including landscaping and parkway improvements along project boundary abutting Verdemont Drive (from Antique Street to the east project boundary) in conjunction with the development.

Intersections:

5 Antique Street (NS) at Verdemont Drive (EW)

- Construct the project driveway with one inbound lane and one outbound lane.
- Install southbound stop control at site egress.

Project Street “A” (NS) at Verdemont Drive (EW)

- Construct the project driveway with one inbound lane and one outbound lane.
- Install southbound stop control at site egress.

Project Street “G” (NS) at Verdemont Drive (EW)

- Construct the project driveway with one inbound lane and one outbound lane.
- Install southbound stop control at site egress.

This analysis also assumes the project shall comply with the following conditions as part of the City of San Bernardino standard development review process to ensure adequate geometric design and emergency access:

- Site-adjacent roadways shall be constructed or repaired at their ultimate half-section width, including landscaping and parkway improvements in conjunction with development, or as otherwise required by the City of San Bernardino.
- All on-site and off-site roadway design, signing/stripping, and traffic control improvements relating to the proposed project shall be submitted to the City for review and constructed following applicable State/Federal engineering standards to the satisfaction of the City of San Bernardino.
- The final grading, landscaping, and street improvement plans shall demonstrate that applicable sight distance requirements are met.
- The project shall comply with the City of San Bernardino municipal parking requirements which will be reviewed as a part of the standard development review process.
- Final project plans shall demonstrate adequate emergency vehicle access and circulation to the satisfaction of the City of San Bernardino Public Works and Fire Departments.
- A construction worksite traffic control plan shall comply with applicable engineering standards outlined in the California Manual of Uniform Traffic Control Devices and shall

be submitted to the City for review and approval before the issuance of a grading permit or start of construction. The plan shall identify any roadway, sidewalk, bike route, or bus stop closures and detours as well as haul routes and hours of operation. All construction-related trips shall be restricted to off-peak hours to the extent possible.

Project design features, as detailed in the Site Access & On-Site Circulation, involve improvements necessary to provide Project Site access.

The Project Site is not adjacent to windy roads. Moreover, the Proposed Project is the development of 105 single-family dwelling units on 107.7 acres of vacant parcels. It does not include a geometric design or incompatible uses that would substantially increase hazards. Therefore, less significant impacts are identified or anticipated, and no mitigation measures are required.

- d) **Less than Significant Impact.** Verdemon Drive would provide access to the Project Site between Antique Street and Chason Way and would continue to serve as the primary evacuation and emergency access route within the area, as designated in the City of San Bernardino General Plan Circulation Plan Figure C-2. During construction activities associated with the proposed on- and off-site improvements, traffic lanes located immediately adjacent to the Project Site may be temporarily closed or controlled by construction personnel. However, this would be temporary and emergency access to the Project Site and surrounding area would be required to be maintained at all times. Additionally, all construction staging would occur within the boundaries of the Project Site and would not interfere with circulation along Verdemon Drive, Antique Street, Chason Way or any other nearby roadways. The proposed improvements would not impede or interfere with the evacuation plan. Therefore, there are no significant impacts that would occur and no mitigation measures are required.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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XVIII. TRIBAL CULTURAL RESOURCES:

- a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is?
- i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or?
- ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in

☐	☐	☒	☐
☐	☒	☐	☐

Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Discussion:

a)

- i) **Less than Significant.** A Phase I Cultural Resources Investigation dated August 14, 2024, updated February 20, 2025, was prepared for the Project Site by Brian F. Smith and Associates, Inc. (Appendix C). Historic land use data was compiled by BFSA Environmental Services through institutional records search, archival research, an intensive cultural resource survey of the entire approximately 107.7-acre study area, and the preparation of a technical report. Research confirms no federally listed historical resources are identified in the immediate vicinity. The earliest available aerial photograph of the project area was taken in 1930 and indicates that the southern portion of the property was being used for agriculture, as evidenced by plowed and tilled swaths of land, while the northern portion of the property appears undeveloped. Structures within the boundaries of Site SBR-7045H can be seen in the south-central portion of the property along a line of trees. Several dirt roads provide access to the agricultural fields and structures throughout the southern portion of the property and are present, but less extensive, in the northern portion of the property. A 1937 aerial photograph depicts these fields, structures, and roads in greater detail. Between 1930 and 1953 (Plate 3.2–4), the property appears relatively unchanged, with only minor changes to the layout of the dirt roads. By 1980, the agricultural fields within the property appear barren and the structures associated with SBR-7045H are no longer visible. Subsequent aerial photographs demonstrate that the property remained vacant and relatively unchanged throughout the 1980s until the present day, with periodic grading and clearing occurring in the southern portion of the project. BFSA staff located previously recorded historic Site SBR-7045H and recorded and evaluated its present condition. SBR-7045H was first recorded in September 1991, during a cultural resources survey conducted by Robin E. Laska and Mark T. Swanson of Research Associates (Laska and Swanson 1991). Laska and Swanson (1991) noted that the site exhibited “heavy disturbance” due to previous cultivation and modern vehicle use. As a result, SBR-7045H was recorded as not significant and ineligible for listing on the National Register of Historic Places. Further archaeological testing was not recommended; however, due to the possibility of buried cultural resources, Laska and Swanson (1991) recommended archaeological monitoring for any future earthmoving activities within the project area.

In 2004, SBR-7045H was re-evaluated as part of a cultural resources survey for APN 0348121-14 conducted by CRM Tech (Tang et al. 2004). This study renumbered several of the features and updated the site to include four additional features. These additional features included an earthen reservoir (Feature 4), two stacked rock walls (Features 5 and 6), and a refuse scatter (Feature 8) (Tang et al. 2004). The metal irrigation pipes recorded as Features 5 and 6 by Laska and Swanson in 1991 were noted during the 2004 study but were not re-evaluated or assigned new numbers because they were outside of the APE. The 2004 study evaluated Site SBR7045H as not CEQA significant and ineligible for listing on the CRHR (Tang et al. 2004).

- ii) **Less than Significant with Mitigation Incorporated.** California Assembly Bill 52 (AB52) was approved by Governor Brown on September 25, 2014. AB52 specifies that CEQA projects with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource may have a significant effect on the environment. As such, the bill requires lead agency consultation with California Native American tribes traditionally and culturally affiliated with the geographic area of a Proposed Project, if the tribe requested to the lead agency, in writing, to be informed of Proposed Projects in that geographic area. The legislation further requires that the tribe-requested consultation be completed prior to determining whether a negative declaration, mitigated negative declaration, or environmental impact report is required for a project.

The Yuhaaviatam of San Manuel Nation provided an email to the City indicating that the Project Site was within their Ancestral Tribal Territory. Tribal consultation took place via email. At the end of consultation, and subsequently in a letter dated, the Tribe provided specific mitigation measures to be adopted by the City (TCR-1 through TCR-2). The City also received a response via email from the Gabrieleno Band of Mission Indians-Kizh Nation on May 7, 2025, providing mitigation measures TCR-3 through TCR-5). These Mitigation Measures are listed below; incorporation of mitigation would result in less than significant impacts.

Yuhaaviatam of San Manuel Nation

Mitigation Measure TCR-1: General Procedures and Protocols to Be Implemented During Construction Monitoring During Grading

A. Monitor(s) Shall Be Present During Grading/Excavation/Trenching

1. The archaeological monitor with at least 3 years of regional experience in archaeology shall be present for the initial clearing of the property and then periodically, as determined by the project archaeologist.
2. The Principal Investigator (PI) may submit a detailed letter to the City of San Bernardino during earthwork to inform the City and the Consulting Tribes, including Yuhaaviatam of San Manuel Nation Cultural Resources Management Department (YSMN), of a modification to the monitoring program when field conditions require a change in monitoring status. The suspension of archaeological monitoring will be determined in consultation with the Consulting Tribes.

B. Discovery Notification Process

1. In the event of an archaeological discovery, either historic or prehistoric, the archaeological monitor shall direct the contractor to temporarily divert all soil-disturbing activities, including but not limited to, digging, trenching, excavating, or grading activities in the area of discovery and in the area reasonably suspected to overlay adjacent resources.
2. If the discovered resource is associated with the precontact Native American occupation of this area, all ground-disturbing activities shall be suspended 60 feet around the resource(s), and an Environmentally Sensitive Area (ESA) physical demarcation/barrier constructed. The Consulting Tribes, including YSMN, shall be contacted to review and participate in the evolution of the discovered resource.

3. The monitor shall immediately notify the PI (unless monitor is the PI) of the discovery, and subsequently the property owner, Lead Agency, and the Consulting Tribes shall be notified of the discovery.

C. Determination of Significance

1. The PI shall evaluate the significance of the resource. If human remains are involved, follow protocol in Section D, below.
 - a. The PI shall immediately notify the Lead Agency and the Consulting Tribes to discuss significance determination and develop a research design that shall include a plan to evaluate the resource for significance under CEQA criteria. Representatives from YSMN, the Archaeologist, and the Lead Agency shall confer regarding the research design, as well as any testing efforts needed to delineate the resource boundary. Following the completion of evaluation efforts, all parties shall confer regarding the resource's archaeological significance, its potential as a Tribal Cultural Resource (TCR), and avoidance (or other appropriate treatment) of the discovered resource. This Plan shall allow for a monitor to be present that represents YSMN for the remainder of the project, should YSMN elect to place a monitor on-site.
 - b. If the resource is significant, the PI shall submit an Archaeological Data Recovery Program (ADRP) to the Lead Agency and YSMN to review and approve. Impacts to significant resources must be mitigated by the implementation of the ADRP before ground-disturbing activities in the area of discovery will be allowed to resume.
 - c. If the resource is not significant, the PI shall submit a letter to the City of San Bernardino and the Consulting Tribes, indicating that artifacts will be collected, curated, and documented in the final monitoring report. The letter shall also indicate that no further archaeological work is required.

D. Discovery of Human Remains

If human remains are discovered, work shall halt in that area until a determination can be made regarding the provenance of the human remains, and the following procedures as set forth in CEQA Section 15064.5(e), the California PRC (Sec. 5097.98), and the State Health and Safety Code (Sec. 7050.5) shall be undertaken:

I. Notification

1. The archaeological monitor shall notify the PI, if the monitor is not qualified as a PI.

The PI shall notify the medical examiner after consultation with the lead agency, either in person or via telephone.

II. Isolate discovery site

1. Work shall be directed away from the location of the discovery and any nearby area reasonably suspected to overlay adjacent human remains until a determination can be made by the medical examiner in consultation with the PI concerning the provenance of the remains.

2. The medical examiner, in consultation with the PI, will determine the need for a field examination to determine the provenance.
3. If a field examination is not warranted, the medical examiner will determine, with input from the PI, if the remains are or are most likely to be of Native American origin.

III. If human remains **ARE** determined to be Native American

1. The medical examiner will notify the NAHC within 24 hours. By law, **ONLY** the medical examiner can make this call.
2. The NAHC will immediately identify the person or persons determined to be the Most Likely Descendent (MLD) and provide contact information.
3. The MLD will contact the PI within 24 hours or sooner after the medical examiner has completed coordination to begin the consultation process in accordance with CEQA Section 15064.5(e), the California Public Resources, and the State Health and Safety Code.
4. The MLD will have 48 hours to make recommendations to the property owner or representative for the treatment or disposition with proper dignity of the human remains and associated grave goods.
5. Disposition of Native American human remains will be determined between the MLD and the PI, and, if:
 - a. The NAHC is unable to identify the MLD, OR the MLD failed to make a recommendation within 48 hours after being notified by the NAHC; OR
 - b. The landowner or authorized representative rejects the recommendation of the MLD and mediation in accordance with PRC 5097.94 (k) by the NAHC fails to provide measures acceptable to the landowner; THEN
 - c. Upon the discovery of multiple Native American human remains during a ground-disturbing land development activity, the landowner may agree that additional conferral with descendants is necessary to consider culturally appropriate treatment of multiple Native American human remains. Culturally appropriate treatment of such a discovery may be ascertained from review of the site utilizing cultural and archaeological standards. Where the parties are unable to agree upon the appropriate treatment measures, the human remains and grave goods buried with the Native American human remains shall be reinterred with appropriate dignity.

IV. If human remains are **NOT** Native American

1. The PI shall contact the medical examiner and notify them of the historic- era context of the burial.
2. The medical examiner will determine the appropriate course of action with the PI and lead agency staff (PRC 5097.98).
3. If the remains are of historic origin, they shall be appropriately removed and conveyed to the lead agency. The decision for internment of the human
 - a. remains shall be made in consultation with the lead agency, the applicant/landowner, and any known descendant group.

Mitigation Measure TCR-2: Post-Construction

A. Preparation and Submittal of Draft Monitoring Report

1. The PI shall submit to the City a draft monitoring report (even if negative) prepared in accordance with the agency guidelines, which describes the results, analysis, and conclusions of all phases of the archaeological monitoring program (with appropriate graphics).
 - a. For significant archaeological resources encountered during monitoring, the ADRP shall be included in the draft monitoring report.
 - b. Recording sites with the State of California DPR shall be the responsibility of the PI, including recording (on the appropriate forms-DPR 523 A/B) any significant or potentially significant resources encountered during the archaeological monitoring program.
 - c. All draft records/reports containing the significance and treatment findings and data recovery results shall be prepared by the archaeologist and submitted to the Lead Agency and YSMN for their review and comment. After approval from all parties, the final reports and site/isolate records are to be submitted to the local CHRIS Information Center, the Lead Agency, and YSMN.
2. The PI shall submit a revised draft monitoring report to the City and the Consulting Tribes for approval, including any changes or clarifications requested by the City and the Consulting Tribes.

B. Handling of Artifacts

1. The PI shall be responsible for ensuring that all cultural remains collected are cleaned and cataloged.
2. Removal of any precontact cultural resource(s) shall be conducted with the presence of a Tribal monitor representing the YSMN, unless otherwise decided by YSMN. All plans for analysis shall be reviewed and approved by the Applicant and YSMN prior to implementation, and all removed material shall be temporarily curated on-site in a secure location. No precontact cultural resource(s) shall be removed from the project area without prior approval from YSMN.
3. The PI shall be responsible for ensuring that all artifacts are analyzed to identify function and chronology as they relate to the history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate.
4. The cost for curation is the responsibility of the property owner.

C. Curation of Artifacts

1. Any historical artifacts recovered from the project shall be curated in an approved facility, such as the Western Science Center.
2. It is the preference of YSMN that removed precontact cultural material be reburied as close to the original find location as possible. However, should reburial within/near the original find location during project implementation not be feasible, then a reburial location for future reburial shall be decided upon by YSMN, the landowner, and the Lead Agency, and all finds shall be reburied within this location. Additionally, in this case, reburial shall not occur until all ground-disturbing activities associated with the project have been completed, all monitoring has ceased, all cataloging and basic

recordation of cultural resources have been completed, and a final monitoring report has been issued to Lead Agency, CHRIS, and YSMN. All reburials are subject to a reburial agreement that shall be developed between the landowner and YSMN outlining the determined reburial process/location, and shall include measures and provisions to protect the reburial area from any future impacts.

3. Should it occur that avoidance, preservation in place, and on-site reburial are not an option for treatment, the landowner shall relinquish all ownership and rights to this material and confer with YSMN to identify an American Association of Museums (AAM)-accredited facility within the County that can accession the materials into their permanent collections and provide for the proper care of these objects in accordance with the 1993 CA Curation Guidelines. A curation agreement with an appropriate qualified repository shall be developed between the landowner and museum that legally and physically transfers the collections and associated records to the facility. This agreement shall stipulate the payment of fees necessary for permanent curation of the collections and associated records and the obligation of the Project developer/applicant to pay for those fees.

D. Final Monitoring Report(s)

1. The PI shall submit the approved final monitoring report to the City, the Consulting Tribes, and any interested parties.

Gabrieleno Band of Mission Indians-Kizh Nation

Mitigation Measure TCR 3: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities

- A. The project applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any “ground-disturbing activity” for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). “Ground-disturbing activity” shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.
- B. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of: 1) the commencement of any ground-disturbing activity, or 2) the issuance of any permit necessary to commence a ground-disturbing activity.
- C. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or “TCR”), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request to the Tribe.
- D. On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh from a designated point of contact for the project applicant/lead

agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs.

Mitigation Measure TCR 4: Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial)

- A. Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.

Mitigation Measure TCR 5: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects

- A. Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute.
- B. If Native American human remains and/or grave goods are discovered or recognized on the project site, then Public Resource Code 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed.
- C. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2).
- D. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods.
- E. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

With implementation of these mitigation measures, impacts to tribal cultural resources would be less than significant.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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XIX. UTILITIES AND SERVICE SYSTEMS –
Would the project:

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or | ☐ | ☐ | ☒ | ☐ |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
telecommunications, the construction or relocation of which could cause significant environmental effects?				
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d) Generate solid waste in excess of State or local standards or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Discussion:

- a) **Less than Significant Impact.** The Project Site is located within the service area of the San Bernardino Municipal Water Department (SBMWD). SBMWD produces all of its water supply from wells in the San Bernardino Basin Area. In addition to potable water, SBMWD provides wastewater treatment services and is developing a recycled water system for groundwater recharge and non-potable reuse. The Proposed Project will connect to an existing sewer line along Verdemonst Drive. The sewer system is maintained by the City's Engineering Department.

Development of the Proposed Project would result in new impervious surfaces on-site. However, the Proposed Project includes two underground water basins. Drainage A with the capacity of 2.94 acre-feet (128,053 CF) and Drainage Area C with the capacity of 0.50 acre-feet (21,619 CF) and any excess water shall be conveyed to a proposed reinforced concrete pipe that will connect to the existing 63-inch Chestnut Avenue Storm Drain within Verdemonst Avenue. The existing site generally drains to the south. With a retention volume of 55,883 cubic-feet (CF), located within the southern portion of the Project Site. As such, direct infiltration of storm water from impervious surfaces would be captured and would allow for groundwater recharge.

Southern California Edison (SCE) provides electrical service to the Project Site. The Proposed Project will receive electrical power by connecting to SCE's existing power lines along Verdemonst Drive, south of the Project Site. The increased demand is expected to be sufficiently served by the existing SCE electrical facilities. As stated in Section VI, in 2022, the Residential sector of the

Southern California Edison planning area consumed 39400.222464 GWh of electricity. Based on the CalEEMod emission output tables for the Proposed Project, the estimated electricity demand is 0.875107 GWh (see Appendix A). The Proposed Project's estimated annual electricity consumption compared to the 2022 annual electricity consumption of the overall Residential Sector in the SCE Planning Area would account for approximately 0.0022211 percent of total electricity consumption. Therefore, the increase in electricity demand from the project would represent an insignificant percentage of the overall demand in SCE's service area.

Southern California Gas Company (SoCalGas) provides natural gas service to the vicinity and the Project Site. The Proposed Project will receive natural gas by connecting to SCE's existing lines along Foothill Boulevard, south of the Project Site. As stated in Section VI, the Proposed Project's estimated annual natural gas demand (CalEEMod output) is 35,983.17 therms per year. According to the California Energy Commission, the natural gas consumption of the SoCal Gas's residential sector was approximately 2275.170830 million therms in 2022. The Proposed Project's estimated annual natural gas consumption, compared to the 2021 annual natural gas consumption of the overall residential sector in the SoCal Gas Planning Area would account for approximately 0.0015816 percent of the total natural gas consumption. Therefore, projected natural gas demand would not significantly impact SoCal Gas's level of service.

Telecommunication services to the area would be provided by Verizon via above ground connections from existing telephone lines south of the Project Site. The Proposed Project is not anticipated to require the expansion or construction of new communications systems facilities.

The Proposed Project is not anticipated to require or result in the relocation or construction of new or the extensive expansion of water, wastewater treatment or storm water drainage, electrical power, natural gas, or telecommunications facilities that could cause significant environmental effects. Less than significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

- b) **Less than Significant Impact.** As stated in the 2020 SBMWD UWMP, during a multiple dry-year period, the SBMWD's total water supply is projected to be 58,963 acre-feet (AF) by 2045, while the total water demand is projected to be 51, 272 AF in the same year, which would result in a 7,691 AF annual surplus.³² Therefore, the UWMP indicated that the SBMWD's supplies have been determined to be sufficient to meet demands within the district's service area during normal, dry, and multiple years through the year 2045.

At a conservatively estimated per household water demand of 600 gallons per day, the Proposed Project would have a total annual water demand of 77.3 acre-feet which is approximately 1 percent of the projected water surplus for the service area. Water supplies would be sufficient to serve the Proposed Project and reasonably foreseeable future development. Less than significant impacts are identified or anticipated, and no mitigation measures are required.

- c) **Less than Significant Impact.** The Proposed Project would be served by the City of San Bernardino sewer collection and treatment system, which has wastewater treated by the City of San Bernardino Municipal Water Department (SBMWD). The SBMWD is responsible for two treatment plants that provide secondary and tertiary treatment levels. The San Bernardino Water Reclamation Plant (SBWRP) provides secondary treatment of wastewater collected from the cities

³² 2020 Integrated Regional Urban Water Management Plan. Part 2 Chapter 8 SBMWD 2020 UWMP. Table 8-16. DWR 7-4R Multiple Dry Years Supply and Demand Comparison (AF). Accessed June 4, 2024.

of San Bernardino, Loma Linda, and Highland, and the San Bernardino International Airport.³³ The existing flow to the SBWRP of 28 million gallons per day (MGD) is far less than the existing design capacity of 33 MGD. Buildout of the plant's service area could be expected to increase cumulatively by another 20.2 MGD for a total flow of 48.2 MGD. Treated discharge from the SBWRP is then piped downstream to the Rapid Infiltration/Extraction Plant (RI/X) where flows are treated to tertiary levels and discharged to the Santa Ana River. An estimated 10 MGD of capacity remains at the RI/X plant. Therefore, less than significant adverse impacts are identified or anticipated, and no mitigation measures are required.

- d) **Less than Significant Impact.** Solid waste from the City of San Bernardino is transported to and disposed of at either the San Timoteo or Mid-Valley Sanitary Landfill. Construction debris would be recycled and/or transported to the Mid-Valley Sanitary Landfill. The temporary generation of construction debris would not permanently affect the long-term landfill capacity. The San Timoteo Sanitary Landfill is located on San Timoteo Canyon Road and is 366 acres in size. It has a maximum permitted capacity of 23,685,785 cubic yards and a maximum permitted daily throughput of 2,000 tons. As of April 30, 2019, the remaining capacity was 12,360,396 cubic yards.³⁴ According to CalRecycle's estimated solid waste generation rates for residential uses, the Proposed Project would generate at most, approximately 3,841 of solid waste per day or approximately 1.9 tons per day, based on 10 pounds per person per day.³⁵ Therefore, the Proposed Project solid waste generation contribution to these landfills would be nominal and would not exceed the daily permitted capacities of these facilities. Therefore, less than significant adverse impacts are identified or are anticipated, and no mitigation measures are required.
- e) **Less than Significant Impact.** During construction, the Proposed Project would comply with the City of San Bernardino waste reduction programs, including recycling and other diversion programs to divert the amount of solid waste disposed of in landfills. Materials that are not recycled in compliance with the Integrated Waste Management Act (AB 939) are taken to one of two regional landfills in the valley (San Timoteo: permitted until 2026 or Mid-Valley: permitted until 2033). Post-construction activities at the Project Site are not anticipated to result in a significant amount of solid waste generation. The Proposed Project would comply with all applicable solid waste statutes and regulations. Therefore, less than significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

³³ City of San Bernardino Municipal Water Department. <https://www.sbmwd.org/176/Water-Reclamation>. Accessed February 16, 2024.

³⁴ CalRecycle. Solid Waste Information System database. Accessed February 5, 2024.

³⁵ CalRecycle. Estimated Solid Waste Generation Rates. Accessed February 5, 2024.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
XX. WILDFIRE – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☒	☐	☐
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary ongoing impacts to the environment?	☐	☐	☒	☐
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

Discussion:

- a) **Less than Significant Impact.** The City of San Bernardino General Plan does not identify the Project Site or the vicinity as an emergency evacuation area. Further, the Project Site is within a Very High Fire Hazard Severity Zone in a State Responsibility Area, as mapped April 1, 2024.³⁶ The nearest evacuation route to the Project Site is the I-215, which is located 0.9 miles south of the Project Site. Emergency access to the Project Site would be located on proposed “A” Street from either Little League Drive or Antique Street. During construction and long-term operation, the contractor would be required to maintain adequate emergency access for emergency vehicles as required by the City. The Proposed Project would not impair an adopted emergency response plan or emergency evacuation plan; therefore, less than significant impacts are identified or are anticipated, and no mitigation measures are required.
- b) **Less than Significant Impact with Mitigation.** The City of San Bernardino is susceptible to wildland fires due to the steep terrain and highly flammable chaparral vegetation of the foothills of the San “Bernardino Mountains and high winds that correspond with seasonal dry periods. As shown in Figure S-9 “Fire Hazards Areas” of the City of San Bernardino General Plan, due to the

³⁶ <https://experience.arcgis.com/experience/03beab8511814e79a0e4eabf0d3e7247/>

location of the Project Site, it is identified in an area of risk for fire hazard.³⁷ The Project Site is also located within the City of San Bernardino's Foothill Fire Zone Overlay. As discussed in the City's General Plan, the Overlay district mitigates the spread of wildfires, helps minimize property damage, and reduces the risk to public health and safety. Additionally, the City of San Bernardino has engaged in a rigorous spring (May) and fall (October) Weed Abatement Program for the past 20 years. The Weed Abatement Program reduces the potential for vegetation fire during the annual windy season and also reduces blight caused by tumble weeds, recurrent growth and/or debris. With the adherence to applicable City policies and regulations, the development of the Proposed Project would not be anticipated to exacerbate wildfire risks, thereby exposing project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Implementation of fire-resistant building materials, creating defensible spaces around homes, and establishing wildfire buffer zones, would help reduce the risk of wildfires spreading to communities. Implementation of Mitigation Measure HAZ-1 would reduce impacts to less than significant.

- c) **Less than Significant Impact.** The Project Site is located on the north side of Little League Drive and Verdemon Drive. The Project Site has a slope of about seven to nine percent. The implementation of the Proposed Project would reduce the risk of wildfire by eliminating the parcels' existing ruderal vegetation and providing a paved foundation. Table H-38 Residential Development Standards in the San Bernardino General Plan states that the setbacks from the front of the house are 25, 20 from the rear, 5 from the side, and 15 feet from the street side. . Moreover, the Project Site is surrounded by vacant land to the north, and to the west. Single-family residences are located to the east and to the south of the Project Site. The Proposed Project would not include the installation of utilities such as power lines or other utilities that may exacerbate fire risk or that may result in temporary ongoing impacts to the environment. The City Fire Marshal will review the final design prior to the issuance of development permits to ensure the mitigation of fire hazards. Therefore, less than significant impacts are identified or anticipated, and no mitigation measures are required.
- d) **No Impact.** According to the Geotechnical Report, and the City of San Bernardino General Plan Figure S-1 "100-Year Flood Plain" the Project Site is not located within a flood plain. Moreover, there are no dams, reservoirs, or large bodies of water near the Project Site. Therefore, the Proposed Project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability or drainage changes. No significant impacts are identified or anticipated, and no mitigation measures are required.

³⁷ City of San Bernardino General Plan, Figure S-9 "Fire Hazards Areas"
<http://www.sbcity.org/civicax/filebank/blobdload.aspx?blobid=26199>. Page 10-43

Potentially Significant Impact	Less Than Significant With Mitigation Incorporation	Less Than Significant Impact	No Impact
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XIX. MANDATORY FINDINGS OF SIGNIFICANCE

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|--|--------------------------|-------------------------------------|-------------------------------------|--------------------------|
| a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of major periods of California history or prehistory? | ☐ | ☒ | ☐ | ☐ |
| b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.) | ☐ | ☐ | ☒ | ☐ |
| c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? | ☐ | ☐ | ☒ | ☐ |

Discussion:

- a) **Less than Significant Impact with Mitigation Incorporated.** A Biological Resources Assessment dated August 23, 2024, was completed by ELMT Consulting (ELMT) and is included as Appendix B and summarized herein. As part of the biological assessment, ELMT conducted a background data search for information on plant and wildlife species known occurrences within the vicinity of the Project Site. The data review included biological text on general and specific biological resources, and resources considered to be sensitive by various wildlife agencies, local government agencies and interest groups. A field survey of the Project Site was conducted on July 22, 2024. The field survey included an evaluation of the surrounding habitats and a focused habitat assessment for species identified in the background data search. To ensure potential impacts to these species are reduced to a less than significant level, the Proposed Project shall adhere to Mitigation Measure BR-1 through BR-3.

Mitigation Measure BR-1: Preconstruction Survey for Nesting Birds

Nesting birds are protected pursuant to the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (Sections 3503, 3503.5, 3511, and 3513 prohibit the take, possession, or destruction of birds, their nests or eggs). In order to protect migratory bird species, a nesting

bird clearance survey should be conducted prior to any ground disturbance or vegetation removal activities that may disrupt the birds during the nesting season.

If construction occurs between February 1st and August 31st, a pre-construction clearance survey for nesting birds should be conducted within three (3) days of the start of any vegetation removal or ground disturbing activities to ensure that no nesting birds will be disturbed during construction. The biologist conducting the clearance survey should document a negative survey with a brief letter report indicating that no impacts to active avian nests will occur. If an active avian nest is discovered during the pre-construction clearance survey, construction activities should stay outside of a no-disturbance buffer. The size of the no-disturbance buffer will be determined by the wildlife biologist and will depend on the level of noise and/or surrounding anthropogenic disturbances, line of sight between the nest and the construction activity, type and duration of construction activity, ambient noise, species habituation, and topographical barriers. These factors will be evaluated on a case-by-case basis when developing buffer distances. Limits of construction to avoid an active nest will be established in the field with flagging, fencing, or other appropriate barriers; and construction personnel will be instructed on the sensitivity of nest areas. A biological monitor should be present to delineate the boundaries of the buffer area and to monitor the active nest to ensure that nesting behavior is not adversely affected by the construction activity. Once the young have fledged and left the nest, or the nest otherwise becomes inactive under natural conditions, construction activities within the buffer area can occur.

Mitigation Measure BR-2: Pre-Construction Burrowing Owl Clearance Survey

To avoid direct impacts to burrowing owls, a Designated Biologist shall conduct a pre-construction presence/absence survey for burrowing owls in accordance with CDFW's Staff Report on Burrowing Owl Mitigation. Two surveys shall be conducted, the first 14 days prior to ground disturbing activities and the second within 24 hours immediately before ground disturbing activities. If burrowing owls are documented on-site, the Applicant shall prepare and implement a plan for avoidance or passive exclusion, in coordination with the California Department of Fish and Wildlife (CDFW). If no burrowing owls are observed onsite, no further review will be required.

The Jurisdictional Delineation (JD) was prepared by ELMT Consulting, dated February 3, 2025 and is included as Appendix B-1. There were no features considered jurisdictional to the United States Army Corps of Engineers (USACE). The ephemeral channel recorded fall outside the jurisdiction of the USACE pursuant to Section 404 of the Clean Water Act. No USACE jurisdictional wetlands, isolated or otherwise, were identified within the project area. The delineation indicates that Drainage 1 does meet the criteria to be considered jurisdictional under the RWQCB and CDFW. The total amount of impacts to Drainage 1 are shown within Appendix B-1. The following mitigation measures are recommended for the project to compensate for the impact on Drainage 1.

Mitigation Measure BR-3: Prior to the issuance of a grading permit, the project applicant shall obtain a Streambed Alteration Agreement under Section 1602 of the California Fish and Game Code from CDFW and a Report of Waste Discharge from the RWQCB.

With implementation of Mitigation Measures BR-1 through BR-3, impacts to "any species identified as a candidate, sensitive or special status species would be reduced to less than significant levels with mitigation incorporated.

Brian F. Smith and Associates, Inc (BFSA) prepared a Cultural Resources Assessment for the Proposed Project dated August 14, 2024. An archaeological field survey of the Project Site was conducted on July 16 and 17, 2024. During the field survey, BFSA archaeologists did not identify any cultural resources within the Project Site boundaries. Excavations and grading for previous (abandoned) construction projects that have disturbed the entire project. Based on negative findings during the field survey combined with the high level of disturbance, development of the Proposed Project is not anticipated to result in significant impacts to archaeological or historical resources, and no further investigations or monitoring are recommended. There is no evidence that human remains will be identified within the project area, but the presence cannot be completely ruled out. Although BRC Consulting did not indicate the Project Site as sensitive for cultural resources, significant impacts could occur during site earthmoving activities, and as well as input from the SMBMI, Mitigation Measures CUL-1 through CUL-5 are recommended to reduce impacts to a less than significant level.

Mitigation Measure CUL-1 Prehistoric or Historic Archaeological Resources:

Should unanticipated or inadvertent surface and/or subsurface prehistoric or historic archaeological resources, built environment, and/or tribal cultural resources appear to be encountered during construction or maintenance activity associated with this project, then all work must halt within a 60-foot radius of the discovery until a qualified professional can evaluate the discovery. If the finds are archaeological or historic in nature, then an archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for prehistoric and/or historic archaeology, shall evaluate the significance of the find. This archaeologist shall have the authority to modify the no-work radius as appropriate, using professional judgment. If the discovered resource is associated with the prehistoric Native American occupation of this area, a Native American representative from a local tribe shall be contacted to review and participate in the evaluation of the discovered resource. The qualified archaeologist shall notify the City of the discovery.

If the resource is significant, the qualified archaeologist shall submit an Archaeological Data Recovery Program (ADRP) to the City to review and approve. Impacts to significant resources must be mitigated before ground disturbing activities in the area of discovery will be allowed to resume. If the resource is not significant, the archaeologist shall submit a letter to the City indicating that artifacts will be collected, curated, and documented in the final monitoring report. The letter shall also indicate that no further work is required.

CUL-2 Monitoring and Treatment Plan: A Monitoring and Treatment Plan that is reflective of the project mitigation ("Cultural Resources" and "Tribal Cultural Resources") shall be completed by the archaeologist and submitted to the Lead Agency for dissemination to the Yuhaaviatam of San Manuel Nation Cultural Resources Management Department (YSMN, also known as San Manuel Band of Mission Indians). Once all parties review and approve the plan, it shall be adopted by the Lead Agency – the plan must be adopted prior to permitting for the project. Any and all findings will be subject to the protocol detailed within the Monitoring and Treatment Plan. This Plan shall allow for a monitor to be present that represents YSMN for the remainder of the project, should YSMN elect to place a monitor on-site.

CUL-3 Archaeological Monitoring: Due to the heightened cultural sensitivity of the proposed project area, an archaeological monitor with at least 3 years of regional experience in archaeology shall be present for all ground-disturbing activities that occur within the

proposed project area (which includes, but is not limited to, tree/shrub removal and planting, clearing/grubbing, grading, excavation, trenching, compaction, fence/gate removal and installation, drainage and irrigation removal and installation, hardscape installation [benches, signage, boulders, walls, seat walls, fountains, etc.], and archaeological work). A sufficient number of archaeological monitors shall be present each work day to ensure that simultaneously occurring ground disturbing activities receive thorough levels of monitoring coverage.

CUL-4 Worker Environmental Awareness Program: Prior to project initiation, a qualified archaeologist should be retained to conduct a Worker's Environmental Awareness Program (WEAP) training on archaeological sensitivity for all construction personnel prior to the commencement of any ground-disturbing activities. The training should be conducted by an archaeologist who meets or exceeds the Secretary of Interior's Professional Qualification Standards for archaeology. Tribal representatives from the Consulting Tribes, such as Yuhaaviatam of San Manuel Nation Cultural Resources Management Department (YSMN, also known as San Manuel Band of Mission Indians) will be allowed to attend and/or participate in the WEAP training should they elect to and will be given ten days' notice prior to the training. Archaeological sensitivity training should include a description of the types of cultural material that may be encountered, cultural sensitivity issues, regulatory issues, and the proper protocol for treatment of the materials in the event of a find.

Mitigation Measure CUL-5 Human Remains: Should human remains and/or cremations be encountered during any earthmoving activities, all work shall stop immediately in the area in which the find(s) are present (no less than 100-ft radius area around the remains and project personnel will be excluded from the area and no photographs will be permitted), and the County of San Bernardino Coroner will be notified. The County of San Bernardino and the Project Proponent shall also be informed of the discovery. The Coroner will determine if the bones are historic/archaeological or a modern legal case. The Coroner will immediately contact the Native American Heritage Commission (NAHC) in the event that remains are determined to be human and of Native American origin, in accordance with California Public Resources Code Section § 5097.98.

All discovered human remains shall be treated with respect and dignity. California state law (California Health & Safety Code § 7050.5) and federal law and regulations ([Archaeological Resources Protection Act (ARPA) 16 USC 470 & 43 CFR 7], [Native American Graves Protection & Repatriation Act (NAGPRA) 25 USC 3001 & 43 CFR 10] and [Public Lands, Interior 43 CFR 8365.1-7]) require a defined protocol if human remains are discovered in the State of California regardless if the remains are modern or archaeological.

All discovered human remains shall be treated with respect and dignity. If the remains are determined to be human, the Coroner will determine their origin: Native American; archaeological but non-Native American; or forensic. If determined to be of Native American origin, the Coroner will contact/notify the Native American Heritage Commission and the Most Likely Descendant (MLD) will be identified. In consultation between the MLD, Lead Agency, and property owner, the disposition of the remains will be determined. Any costs incurred would be the responsibility of the property owner. If the human remains are archaeological (non-Native American), the archaeological consultant will manage the removal, analysis, and reporting. The remains will be reinterred off-site and any costs incurred would be the responsibility of the property owner. If the remains are determined to be of forensic value, the Coroner will arrange for the removal and analysis. The City will assume

responsibility of the remains and the property owner will not be responsible for any related costs.

Mitigation Measure HAZ-1: Prior to the issuance of grading permits, a Fuel Modification Plan shall be prepared for the Proposed Project and submitted to the County Fire Marshal for review and approval. In addition to implementation of the above mitigation measure, the Proposed Project would also be subject to San Bernardino County Development Code Section 82.1.060, Fire Safety Overlay development standards, and Section 82.13.090, Alternative Hazard Protection Measures; and City of San Bernardino Development Code Chapter 19.15 FF, Foothill Fire Zones Overlay District standards. City Development Code standards that may apply are related to access, roadside vegetation, water supply, erosion control, construction and development design, and management of firebreak fuel modification zones.

Implementation of Mitigation Measures of BIO-1 through BIO-3, CUL-1 through CUL-5, and HAZ-1 as provided in this Initial Study, would ensure impacts to biological, cultural resources, and wildfires are less than significant. Therefore, no significant adverse impacts are identified or anticipated, and no additional mitigation measures are required.

- b) **Less than Significant Impact.** Cumulative impacts are defined as two or more individual affects that, when considered together, are considerable or that compound or increase other environmental impacts. The cumulative impact from several projects is the change in the environment that results from the incremental impact of the development when added to the impacts of other closely related past, present, and reasonably foreseeable or probable future developments. Cumulative impacts can result from individually minor, but collectively significant, developments taking place over a period. The CEQA Guidelines, Section 15130 (a) and (b), states:
- (a) Cumulative impacts shall be discussed when the project's incremental effect is cumulatively considerable.
 - (b) The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided of the effects attributable to the project. The discussion should be guided by the standards of practicality and reasonableness.

As concluded in the Traffic Impact Analysis, the Proposed Project would not result in a significant impact to traffic and would not be cumulatively considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects. Similarly, the pollutant emissions from the Proposed Project are below SCAQMD thresholds and therefore, the Proposed Project would be in compliance SCAQMD's AQMP. In addition, greenhouse gas emissions from the Proposed Project are below thresholds. Therefore, air quality and greenhouse gas impacts would not be cumulatively considerable.

Although cumulative impacts are always possible, by incorporating all mitigation measures outlined herein, as part of approving the Proposed Project, would reduce the Project's contribution to any such cumulative impacts to levels that are not cumulatively considerable. Additionally, mitigation measures have been adopted by the City of San Bernardino for buildout of the General Plan, Therefore, with the incorporation of mitigation identified in this document, the Project would result in individually limited, but not cumulatively considerable, impacts. Therefore, no significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

- c) **Less than Significant Impact.** As presented in this Initial Study, the development of the Project as proposed would not cause adverse impacts on humans, either directly or indirectly. The Project Site is not located in an area that is susceptible to significant geologic hazards. In addition, no significant impacts from project-related construction or operational noise were identified. Therefore, implementation of the Proposed Project would not have environmental effects that would cause substantial adverse effects on human beings. At a minimum, the Project will be required to meet the conditions of approval for the Project to be implemented. It is anticipated that all such conditions of approval will further ensure that no potential for adverse impacts will be introduced by construction or operational activities authorized by the Project approval. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

GENERAL REFERENCES

The following references cited in the Initial Study are on file in the City of San Bernardino Development Services Department.

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9. Federal Emergency Management Agency Flood Map Service Center: Search By Address <https://msc.fema.gov/portal/search?AddressQuery=san%20bernardino>.
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CalEEMod, Lilburn Corporation, September 20, 2024. (Appendix A)

ELMT Consulting, Biological Resources Assessment, August 23, 2024 (Appendix B)

ELMT Consulting, Jurisdictional Delineation, February 3, 2025 (Appendix B-1).

BFSA Environmental Services-Cultural Resources Study, updated February 20, 2025 (Appendix C).

Due Diligence Geotechnical Review, September 5, 2024, GeoTek, Inc. (Appendix D),

BFSA Environmental Services- A Perennial Company, Paleontological Assessment, August 14, 2025. (Appendix E)

Fuel Modification Plan Exhibits (Appendix F)

Preliminary Hydrology Study and Drainage Analysis prepared by Joseph E. Bonadiman & Associates, Inc. dated December 2024 (Appendix G).

Preliminary Water Quality Management Plan prepared by Joseph E. Bonadiman & Associates, Inc. dated November 22, 2024 (Appendix H).

Ganddini Group, Inc. Noise Impact Analysis, dated November 8, 2024. (Appendix I)

Ganddini Group, Inc. Vehicle Miles Traveled Analysis dated October 3, 2024 (Appendix J)